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ABSTRACT

This compendium contains information on current policies and practices relative to issues of conflicts of interest and accreditation. Information was submitted, in response to a questionnaire, by 53 national, regional, and specialized accrediting bodies that are recognized by the Council on Postsecondary Accreditation. The compendium presents each of their reported policies and procedures relating to the accreditation process and the avoidance of conflicts of interest. Among the issues covered by the various organizations are the following: site visit preparation and procedures; board composition and site team selection; appeals; ethics; accreditation report review process; affirmative action policy; and matters of confidentiality. A sample of the questionnaire is provided. (GLR)

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The Council On Postsecondary Accreditation

Accreditation and Conflicts of Interest

A Compendium of Current Policy and Practice of Accrediting Bodies Recognized by the Council on Postsecondary Accreditation

1991

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PREFACE

That which follows represents a compendium of current policy and practice relative to issues of conflicts of interest and accreditation as submitted by accrediting bodies recognized by the Council on Postsecondary Accreditation in response to a questionnaire. The compendium is a major resource guide for use during and following a mid-winter, 1991, professional development program held in Washington, D.C. and Chicago, Illinois by the title, "Accreditation and Conflicts of Interest." Primary presenter for this program is Patricia P. Evans, Executive Director, Council on Education for Public Health; Vice/Chair of the Assembly of Specialized Accrediting Bodies; and Chair, COPA Professional Development Committee. Her presentation is available as a COPA monograph.

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ACCREDITING COMMISSION
AMERICAN ASSOCIATION OF BIBLE COLLEGES

Reference/Source:

AABC Manual: Criteria, Policies and Procedures, Constitution and Bylaws, 1990

AABC Commission on Accreditation: 1990 Manual

AABC: The Evaluation Visit, 1990

Policy/Procedures:

Provisions of AABC Manual:

Board Composition

...Members are not to benefit from their positions so as to constitute a conflict of interest....

Composition of an Evaluation Team

...There should be no conflict of interest between the evaluator and the college to be visited, e.g.,same denominational affiliation, same geographic base for constituency, previous affiliation with the college, or previous service to the college as an evaluator or consultant. The team should contain only one person from a given institution and no more than two people from the same denomination....

Selection of the Team Chair

The team chair will be free from potential conflict of interest and....

College's Right to Review

The college to be evaluated has the right to review the names of proposed team members and to request the replacement of any proposed member that it feels would have a bias or conflict of interest in evaluating the college.

Policy on Ethical Practices

...AABC selects evaluation team members on the basis of...their acceptability to the institution to be evaluated. No individual can serve as both consultant and evaluator for an institution during a given cycle of accreditation....

...AABC follows sound evaluation procedures that ensure...(4) ethical and professional practices of evaluators during, preceding, and following the visit, (5) non-acceptance of honoraria by association representatives from an institution (except for scheduled fees) during an institution's accreditation process, (6) expeditious handling of steps in the accreditation process, and ....

Provisions of Commission Manual:

Policy on the Assignment of Primary and Secondary Readers

...To assure objectivity, enhance fairness, and avoid a conflict of interest, primary and secondary readers will not be assigned to a particular college if they share the same denominational affiliation or the same geographic base for constituency, or if they have previously served on the college's faculty or staff, on an evaluation team that visited the college, as a consultant for the college, or as a primary reader for the college.

Provisions of "The Evaluation Visit":

Selection of the Evaluation Team

...There is to be no conflict of interest between the evaluator and the college to be visited, e.g., same denominational affiliation, same geographic base of constituency, previous affiliation with the college, or previous service to the college as an evaluator or consultant. The team should contain only one person from a given institution and no more than two people from the same denomination ....

The Work of an Evaluator

...Objective. The college is to be evaluated solely in light of its own stated mission and objectives and the association's "Criteria for Accreditation." It is not in any way to be evaluated in light of the team member's home college. The association is an interdenominational organization. Sectarian prejudice of any kind is totally inappropriate....

ACCREDITATION COMMISSION
ASSOCIATION OF ADVANCED RABBINICAL AND TALMUDIC SCHOOLS

Reference/Source:

Handbook of the Accreditation Commission

Policy/Procedures:

Handbook Provisions:

Fair Accreditation Practices

Every effort will be made to ensure that:

(a) Only institutions meeting published standards will be accredited.
(b) All standards, policies and procedures are fairly applied.
(c) All evaluations are conducted and decisions rendered under conditions that assure an impartial and objective judgement.
(d) No conflicts of interest will interfere in the rendering of judgements and decisions.
(e) AARTS and all its committees, as well as its Accreditation Commission will perform no function that would not be consistent with the formation of independent and fair judgements.

To ensure that institutions be protected:

(a) The chief executive officer may ask that a member of the visiting team be replaced. This request, accompanied by good and valid reason, should be sent in confidence to the chairman of the Accreditation Commission, who will accede to the request if he deems it reasonable.
(b) A Commission member whose relationship with the institution being considered involves a conflict of interest will absent himself from the case.

ACCREDITING COMMISSION
ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS

Reference/Source:

Criteria, July 1998

"Canons of Ethical Responsibility for AICS Evaluators," July 1988

Policy/Procedures:

Provisions of Criteria:

Ethical Standards

Commissioners, staff and evaluators are instructed to avoid participation in any matter regarding any institution in which they have or might in the future have a personal or professional conflict of interest. As a matter of policy, all Commissioners absent themselves from discussions about their own institutions and all others with which they have a current or prospective relationship. All evaluators sign a canons of ethical responsibility governing their conduct before, during and following the evaluation visits.

Provisions of Canons:

Canons of Ethical Responsibility for AICS Evaluators

The continued existence and acceptance of privately administered accreditation presumes the recognition that the aggregate of the system is based upon the singular integrity of all those individuals charged with the adoption of policies, procedures, standards, and the evaluation and measurement of institutional performance. Members of evaluation teams play a vital role in the maintenance and preservation of the system; therefore, the fulfillment of this role requires an understanding by evaluators of their relationship with and function in the accreditation process.

In fulfilling accreditation responsibilities, an evaluator encounters a variety of issues and situations that require the exercise of fair and impartial judgment. Although the specifics of these issues and situations cannot be foreseen with particularity, fundamental ethical principles are available for guidance. Within the framework of such ethical principles, these Canons of Ethical Responsibility are set forth:

1. An evaluator shall uphold the integrity and independence of the accreditation process.
2. An evaluator shall avoid impropriety and the appearance of impropriety in all activities.
3. An evaluator shall perform all specific duties impartially and diligently.
4. An evaluator shall refrain from any business activity inappropriate to accreditation responsibilities.
5. An evaluator shall decline to serve on any evaluation team which is responsible for evaluating any institution or branch of any institution with which he or she is currently, or presently intends to be, directly or indirectly involved.

6. An evaluator shall preserve confidentiality of the institutional information to which he/she is privy.

These Canons of Ethical Responsibility are promulgated by the Accrediting Commission of the Association of Independent Colleges and Schools so that the many interested publics concerned may know the principles to which each evaluator subscribes.

In the final analysis, it is the desire for the respect and confidence of peers and of the educational institutions served that should provide an evaluator the incentive for the highest possible degree of ethical conduct. The possible loss of that respect and confidence is the ultimate sanction.

COMMISSION ON ACCREDITING
ASSOCIATION OF THEOLOGICAL SCHOOLS IN THE UNITED STATES AND CANADA

Reference/Source:

ATS Procedures, Standards and Criteria for Accreditation, 1990

ATS Handbook of Accreditation, 1990

Policy/Procedures:

Provisions of Procedures and Standards:

Commission on Accrediting

...Members of the commission shall absent themselves from discussion and voting on matters having to do with their own schools.

...Members of the commission shall not vote on decisions about schools they have visited.

Handbook Provisions:

The Visiting Team

...In addition, the following guidelines are normally followed in selecting a team several of which are intended to preclude conflict of interest.

...A person is not sent to a school from which he or she has a degree.

...A person is not sent to a school where he or she has formerly taught or served as an administrator.

...Team members are not selected from schools which are in immediate competition with the school being visited. Given the denominational grouping of schools this very often means that team members are chosen from outside the denomination of the school being visited. The factor of geographic distance from the school being visited is important but is secondary to the above.

...The panel of team members shall always be reviewed with the CEO of the school for approval and to avoid any semblance of conflict of interest.

COMMISSION ON HIGHER EDUCATION
MIDDLE STATES ASSOCIATION OF COLLEGES AND SCHOOLS

Reference/Source:

Handbook for Chairing and Hosting an Evaluation Team, January 1990, and Handbook for Evaluation: Team Members, January 1990

Manual for Institutional Reports and Guidelines for Reviewer Analysis, January 1990

Policy/Procedures:

Provisions of Two Handbooks:

The Ethics of an Evaluation Team Visit

The Commission relies on the personal and professional integrity of individuals to refuse any assignment where even the slightest potential for conflict of interest exists. The Commission Staff will not knowingly assign to participation in an evaluation a person:

- whose home institution is in the state in which the institution to be visited is located;
- who has expressed personal opinions bearing on the accredibility of the institution;
- who has been or is a candidate for employment in the institution to be visited;
- who has been recently an appointee or employee of the institution, or who has close relatives who are appointees, employees or candidates for employment in the institution;
- who is a graduate of the institution.

Only in rare cases will exceptions be made, and then only in consultation with the institution to be visited. To avoid even the appearance of possible conflict of interest, no member of a visiting team may serve as a consultant to the institution for a period of one year following the official accrediting action...

The institution is expected to respect the process by not engaging any team member as a consultant for one year following the evaluation. Similarly, the institution should not consider for permanent employment within one year at the evaluation any member of the evaluation team.

Provisions of Manual:

The PRR Committee Meeting

...The Commission relies on the personal and professional integrity of individuals to refuse any assignment where even the slightest potential for conflict of interest exists. Do not accept an invitation to be an External Reviewer for Periodic Review Reports if you have been an active candidate for employment in the institution, if you have been a recent employee or are related to an employee of that institution, or if you are a graduate of the institution....

COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION
NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES

Reference/Source:

NEASC/CIHE Accreditation Handbook

"CIHE Preliminary Information for Team Members: Fall, 1990"

"Preliminary Information for Team Chairpersons, 1991"

Policy/Procedures:

Handbook Provisions:

Selection of Chair

...Well in advance of the scheduled date for the evaluation, the Commission's Director, with a consideration of the nature and needs of the institution, proposes a team chairperson to the president and solicits institutional comments about the prospective chair. While the Commission always reserves the right to appoint the chair as well as members of the team, the views of the institution are important in ensuring the appropriateness and effectiveness of evaluators.

Selection of Committee Members

...The institution will have been visited by a member of the Commission staff to determine the academic, administrative, and service areas that will need representation on the committee. The Commission maintains an active file of several hundred evaluators. These individuals are usually recommended by the heads of institutions, colleagues who have themselves participated in the evaluation process, Commission members, and the Commission staff. The Commission relies on the personal and professional integrity of individuals to refuse any assignment where even the slightest potential for conflict of interest exists.

Other

...to conduct any evaluation visit to an institution by experiences and qualified examiners under conditions that assure impartial and objective judgment;

...to avoid appointment of visitors who may not be acceptable to an institution;

Provisions of Statement for Team Chairperson:

Conflict of Interest

...The Commission staff selects a team chairperson with no known connection to the visited institution. Any affiliation or special relationship (past or present) with the institution makes a person ineligible to serve on that team. Please inform us if there is any potential conflict of interest of which we are unaware.

Provisions of Statement for Team Members:

Conflict of Interest

...The Commission staff selects evaluators who are appropriate for the institution and experienced in the various areas to be examined. Any affiliation or special relationship (past or present) with the institution makes a person ineligible to serve on that team. Please inform us if these is any potential conflict of interest of which we are unaware.

COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION
NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS

Reference/Source:

Policy Book

Policy/Procedures:

Institution Review of Team (Adopted, January 1983)

The names of persons proposed by the Commission staff to compose a team to visit an institution will be submitted to the institution before any of those persons are invited to serve. The institution will be free to comment on the composition of the team, and staff will take such comments into consideration in completing the team. Should any changes in the team be necessary after the initial team is set, the changes will be discussed with the institution by the staff, and institution comments will be given consideration in making necessary changes.

The Commission reserves final responsibility and authority for composing teams that visit institutions as a part of a Commission evaluation.

Conflict of Interest (Adopted, March 1988)

The Commission will not knowingly assign or participate in any part of an institutional evaluation (visiting team, Readers' or Evaluators' Panels, Review Committee) any person whose past or present activities could cause conflict of interest. In particular the Commission will not knowingly assign to participate in an evaluation a person

whose home state is the principal state in which the institution has its activities;

who has served on a team visiting that institution within the previous five years, unless the institution explicitly approves such participation;

who has expressed personal opinions bearing on the accredibility of the institution;

who has been recently an appointee or employee of the institution, or who has close relatives who are appointees or employees of the institution;

who is a graduate of the institution.

Because of the variety of circumstances that can lead to conflict of interest, the Commission looks to each person participating in its evaluation processes to disqualify himself/herself if for any reason a conflict of interest can arise that would in any way threaten the objectivity of the Commission's evaluation.

Commissioners' Participation on Teams (Adopted, June 1988)

Commissioners may serve on teams with reasonable frequency. They will not serve as chairs of visiting teams.

Commissioners will not participate on Readers' panels, Evaluators' panels, or Review Committees.

Commissioners will not participate in Commission discussion and voting related to final actions on institutions located in their individual states, on institutions which they have visited for the Commission, and on institutions about which they have identified other potential conflicts of interest.

Consultant-Evaluators Serving as Institutional Consultants (Adopted, January 1983)

To avoid the appearance of possible conflict of interest in the accreditation process, no member of the visiting team which evaluated an institution may serve as a consultant to that institution for a period of one year following the official Commission accrediting action. Any Consultant-Evaluators who violates this policy will be dropped automatically from the C-E Corps.

COMMISSION ON COLLEGES
NORTHWEST ASSOCIATION OF SCHOOLS AND COLLEGES

Reference/Source:

Accreditation Handbook, 1988 edition

Policy/Procedures:

From Accreditation Procedural Guide in Handbook:

...In selecting evaluators, care is taken to avoid conflict of interest, such as an evaluator who is a former employee of the institution....

...Commission members will not be present at Commission meetings, during deliberations and voting on issues involving their respective institutions, or when their presence would otherwise constitute a conflict of interest.

From "Principles and Practices Regarding Institutional Mission and Objectives, Policies and Administration":

Prohibit members of its governing boards, faculty or staff from having any financial or other interest which conflicts with the proper discharge of their duties.

From Guidelines, "Accreditation and Nontraditional Study":

To protect the integrity of the faculty-institution work relationship and avoid circumstances involving conflict of interest, policies regarding the amount of outside work for pay and safeguards surrounding use of institutional resources and facilities for their intended purposes are required.

COMMISSION ON COLLEGES
SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

Reference/Source:

Manual for Visiting Committees, 1988

Standing Rules: Commission on Colleges, Executive Council and the College Delegate Assembly, December 1989

Policy/Procedures:

Provisions of Manual:

Selection of Visiting Committee Members

...In no instance does the Commission ask a person to serve on a committee for an institution in his own or her own state or at which the person has been a student, been employed, or served as a consultant.

Provisions of the Standing Rules:

Statement Governing Conflict of Interest

Appropriate precautions will be observed to guard against conflict of interest in arriving at accrediting decisions. Readers assigned as primary reviewers on the Committees on Criteria and Reports will be selected from states different from those in which the institution under consideration is located. Members of the Commission who are employed by the institution under consideration will absent themselves from the room during the discussion and from the vote on their institution. Members of the Commission who believe they have a possible conflict of interest regarding a specific institution will decline assignment as readers and will refrain from discussion and abstain from voting on the institution under consideration.

COMMISSION ON OCCUPATIONAL EDUCATION INSTITUTIONS
SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

Reference/Source:

Policies and Standards of the Commission on Occupational Education Institutions, 1990 Edition

Review Procedures: Commission on Occupational Education Institutions, March 1990

Policy/Procedures:

Provisions of Policies and Standards:

Visiting Teams

...Team members are selected who have expertise in the programs offered by the institutions and knowledge of the standards of the Commission. The team leader and members are selected by the Commission's staff. The team leader and the team members shall come from outside the state of the main campus of the institution and certify that they have no vested interest or conflict of interest in the institution to be visited....

Provisions of Review Procedures:

General Information

...The two readers selected will not be from the same state, from the state in which the institution is located, and neither of the readers will have served on the visiting team to the institution. A reader that is the owner, employee, or has vested interest in an institution must leave the room while the institution is being reviewed. A reader from the same state or that has a conflict of interest of an institution being discussed, shall not take part in the discussion and shall not vote. If a reader has been given an assignment in which he/she served on the visiting team, is from the same state, is biased, has a conflict of interest or vested interest, or for any personal reason think that they should not review the school, the reader will ask the staff to give the assignment to someone else.

Readers for a second or subsequent review shall not be the same as for the first review....

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

Reference/Source:

Handbook of Accreditation, 1990

Policy/Procedures:

Coce of Commission Good Practice and Ethical Conduct (Adopted June 1980)
In carrying out its functions, the Commission has established a code of good practice, both for its relations with institutions which it serves, and with regard to its internal organization and procedures.

In its relations with the institution it accredits, the Commission is committed to:

> ...Conduct evaluation visits by experienced and qualified examiners under conditions which, insofar as reasonably possible, assure impartial and objective judgment, avoiding conflict of interest.
>
> ...Provide institutions an opportunity to object, for cause, to individual members assigned to the team designated to visit the institution, with special concern for possible conflict of interest.

The Commission insists that its members recognize their ethical responsibilities by accepting and subscribing to the defined purposes of accreditation; respecting the confidentiality of relationships ... and committing themselves to full disclosure and restraint in any Commission consideration involving conflict of interest. Members of the Commission will absent themselves from deliberations or vote on decisions regarding the individual institutions of which they are employees or trustees. They shall not participate in deliberation or vote on decisions in which they have any other personal interest that might reasonably appear to suggest divided loyalties or otherwise impair their independent, unbiased judgment. Any such potential conflict of interest shall be reported to the Commission by the commissioner in advance of deliberation and/or action and shall be recorded in the Commission minutes. Any commissioner who is uncertain regarding the possible appearance of conflict of interest shall request the Commission to determine the matter by majority vote. Such request and decision shall be duly noted in the Commission minutes.

The Commission expects that Commission members will accept and carry out the responsibilities, including:

> ...Absenting themselves from deliberations or vote when a potential conflict of interest exists because of affiliation, previous relationships or consultant services.

Commission Membership and Procedures (Revised January 1988)
Commissioners shall absent themselves from the meeting when an institution with which they have any formal relationship is under review.

Commissioners who have participated as a team member in an institutional evaluation may take part in the Commission review but shall not participate in the vote.

ACCREDITING COMMISSION FOR SENIOR COLLEGES AND UNIVERSITIES
WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

Reference/Source:

Handbook of Accreditation

"Policy on Ethical Conduct and Conflict of Interest," Approved November, 1988

Policy/Procedures:

Handbook Provisions:

Responsibilities of All Evaluation Team Members

... It is also Commission policy for team members to refrain from serving on visits to an institution where previous contacts with that institution would create a conflict of interest. Any questions concerning a potential conflict of interest should be directed to Commission staff. Team members are requested to avoid any consulting relationship with institutions for at least one year following an accrediting visit.

Policy Statement Provisions:

Conflicts of Interest

Commission members are expected to commit themselves to full disclosure and restraint in any Commission consideration involving conflict of interest.

a. Members of the Commission will absent themselves from deliberations or vote on decisions regarding the individual institutions of which they are employees or trustees.

b. They shall not participate in deliberations or vote on decisions in which they have any other personal interest that might reasonably appear to suggest divided loyalties or otherwise impair their independent, unbiased judgment.

c. Commission members shall absent themselves from the executive discussion and vote on decisions regarding an institution following a visit on which the Commission member served as chair or team member.

Any such potential conflict of interest shall be reported to the Commission by the commissioner in advance of deliberation and/or action and shall be recorded in the Commission minutes. Any commissioner who is uncertain regarding the possible appearance of conflict of interest shall request the Commission to determine the matter by majority vote. Such request and decision shall be duly noted in Commission minutes.

These restrictions are not intended to disqualify participation by a commissioner in the general run of cases which do not directly or substantially affect the institution with which he or she is associated or its competitive position with a neighboring institution under review.

Consulting Relationships

Commission members are expected to refrain from serving as consultants, paid or otherwise, during their term on the Commission and for at least one year thereafter, for institutions, which are, or expect to become, candidates with, or accredited by, the Commission.

ACCREDITING COMMISSION ON EDUCATION FOR HEALTH SERVICES ADMINISTRATION

Reference/Source:

Accreditation Policies and Procedures Handbook, April 1991, pp. 42 - 43

Policy/Procedure:

Policy on Conflict of Interest

ACEHSA is committed to conducting its affairs in a fashion that eliminates conflict of interest. Conflict arises when a Commissioner, staff member, site visitors, Fellow or other representative of the Commission has a relationship, contractual or otherwise, with a client program or its representatives, which could bias the actions,deliberations or decision of the Commission. The Commission recognizes that the effective implementation of this policy is dependent upon the individuals, acting as the Commission's representatives, to identify conflict and remove themselves from conflict of interest situations.

Following are three examples of mechanisms which the Commission uses to avoid conflict of interest.

1. No Commissioner, staff member, site visitor or Fellow will directly participate in the site visit or deliberations concerning a program or university in which they currently hold or previously held an appointment, from which they are an alumnus, or where any other close relationship exists which may bias objectivity. This level of non-participation will extend to the absenting of the Commissioner or staff member from the room in which the discussion of any such program takes place.

2. Commissioners and Commission representatives will be asked, prior to the selection of the site visit teams each semester, to remove themselves from any upcoming site visit in which they may have a conflict of interest.

3. Each Commissioner, Fellow and trained site visitor completes an information form, the contents of which is entered into the ACEHSA database. All potential conflicts of interest are declared on this form and are entered into the database, which is updated every two years.

ACCREDITING COUNCIL ON EDUCATION IN JOURNALISM AND MASS COMMUNICATION

Reference/Source:

Preparing for Journalism and Mass Communications Accreditation, 1989

ACEJMC By-laws, Adopted May 1988

Policy/Procedures:

Procedures Provisions:

Accreditation Authority, History and Structure

[The Council's] three public members are affiliated with neither journalism and mass communications education nor industry.

Selection of the Site Visit Team

The institution seeking accreditation has the right to review the composition and vitae of the visit team. It has the right to ask that team members who may have a conflict of interest be replaced...Persons invited to serve as a member of a site visit team are expected to disqualify themselves if they are aware of any situation or circumstance that might be a conflict of interest or construed as a conflict of interest and thus call into question the independence of their judgments and decisions.

Review of Report and Response by Accrediting Committee and Accrediting Council

Members of the Accrediting Committee and the Accrediting Council must disqualify themselves from participating in the discussion of and voting upon accreditation issues in which they have a conflict of interest. An example of such a conflict would be if a Committee or Council member served as a consultant to the school before the accreditation.

Appeals

No one shall serve on the Appeals Board in case of a conflict of interest.

Bylaws Provisions:

Meetings

A Council member whose unit is being considered by accreditation or reaccreditation shall not participate in the discussion or vote on that unit. Council members shall leave the Council table, but may remain in the room, during the discussion and vote on their units.

ACCREDITATION COUNCIL
AMERICAN ASSEMBLY OF COLLEGIATE SCHOOLS OF BUSINESS

Reference/Source:

AACSB Accreditation Council Policies, Procedures and Standards, 1991-92

AACSB Accreditation Council Policy Manual, May 1990

Policy/Procedures:

Identical Provisions Both Documents:

Conflict of Interest

A. Members of the American Assembly of Collegiate Schools of Business accreditation committees and staff must refrain from participating in the discussion or vote of accreditation matters if for any reasons a conflict of interest or the appearance of a conflict of interest can arise. Minutes of meetings must reflect this non-participation.

B. Members of AACSB accreditation committees and staff shall not participate in the discussion or vote of accreditation matters for any institution where they have served as private consultants.

   1. Private consulting means providing advice on accreditation to a specific program other than in the course of fulfilling normal position responsibilities. When questions arise regarding the specific applicability of the policy, the matter shall be submitted to AACSB for resolution.

C. Site visitors who are competent to participate in the accreditation review process by virtue of their experience, training, and orientation are presented with opportunities to provide information to and receive information from faculty, staff, administrators, students, and other parties. Reasonable precautions are taken to ensure that site visitors develop and express objective opinions and decisions, free from self-interest and personal bias.

   Persons should not serve as site visitors for a program and they should abstain from deliberations and votes on a program if they

   1. are employed in the competitive proximity, the same system or the same state as the sponsoring institution;

   2. have been appointees of, employees of, or private consultants to the sponsoring institution;

   3. are recent graduates of the sponsoring institution; or the sponsoring institution has asked for their removal from the process.

COUNCIL OF THE SECTION OF LEGAL EDUCATION AND ADMISSIONS TO THE BAR
AMERICAN BAR ASSOCIATION

Reference/Source:

American Bar Association and Association of American Law Schools Statement on Good Practice on Impartiality and Propriety in the Process of Law School Accreditation, Adopted December 1977

Policy/Procedures:

Adopted by the Executive Committee, December 27, 1977 and by the Council, American Bar Association, Section of Legal Education and Admissions to the Bar, December 10, 1977:

A. Those who have significant responsibility in the process leading to accreditation of law schools serve a vital and quasi-judicial function in the legal system of the United States. It is important to the fair and effective functioning of the system of law-school accreditation and to the maintenance of public and professional respect for that system that those who act in it act impartially and avoid even the appearance of impropriety.

B. One who has significant responsibility in this system or who has had significant responsibility in this system within a period of two years, as enumerated in paragraph "D" below, should not serve as a consultant to a law school in any matter relating to:

   1. accreditation by the American Bar Association;

   2. membership in the Association of American Law Schools; or

   3. reinspection and continuation of American Bar Association accreditation or membership in the Association of American Law Schools.

C. This restriction applies to service as consultant whether or not that service is for compensation. It does not apply to informal advice which an advisor renders (i) without fee, (ii) informally, and (iii) which he or she discloses fully to the other members of the accreditation or membership body on which he or she serves or has served; nor does it apply to the routine or official advice and assistance which is rendered by members of an inspection team or hearing commission, by the Consultant on Legal Education to the American Bar Association, by the Executive Director of the Association of American Law Schools, or by persons acting on behalf of the Consultant or Executive Director, or (iv) by a person acting in the normal course of his or her employment.

D. This restriction applies to:

   1. members of the Accreditation Committee of the Council on Legal Education and Admissions to the Bar of the American Bar Association;

   2. the President, other Officers, members of the Board of Governors, and members of the Council of the Section of Legal Education and Admissions to the Bar of the American Bar Association;

3. members of the Accreditation and Academic Freedom Committees of the Association of American Law Schools;

4. the President and members of the Executive Committee of the Association of American Law Schools;

5. members of the professional staff of the American Bar Association or the Association of American Law Schools, except as provided in paragraph "C" above;

6. a member of an inspection team or hearing commission for either Association respecting appointment as a consultant to a law school that he or she has inspected or conducted hearings on, on behalf of either Association within two years after the inspection or while either Association still has under consideration matters developed by the inspection, whichever is the longer;

7. the Executive Director of the Association of American Law Schools or other person acting on behalf of the Association of American Law Schools may not acquiesce in the appointment as consultant on readiness of any person who by the Statement should not accept appointment as a school's consultant.

E. Service as a consultant for a law school does not disqualify a person from any of the offices or committees in paragraph "D". However, the officer or committee member should excuse himself or herself from participation in discussion, formal or informal, of the affairs of a school which he or she has served as consultant or employee, and from taking part in any vote with respect to its status.

F. A person who has served as a consultant or employee of a law school within two years prior to assuming a significant responsibility in the accreditation process should decline to participate in the determination of the accreditation status of the school with which he or she previously served.

G. The Consultant on Legal Education to the American Bar Association, Executive Director of the Association of American Law Schools, or either of them if they are acting cooperatively, shall bring this regulation to the attention of persons who are nominated for or appointed to any of the positions enumerated in paragraph "D" above and to all persons who are holding these positions or who have held them within two years past, at the time the regulation become effective.

AMERICAN COUNCIL FOR CONSTRUCTION EDUCATION

Reference/Source:

Policies and Procedures of the American Council for Construction Education, August 1990

Policy/Procedure:

Policies

The following are the operating procedures under which ACCE fulfills the purposes as outlined in the Articles of Incorporation:

...conduct an evaluation visit to a construction program by experienced and qualified examiners under conditions that assure impartial and objective judgement, including representation from the staffs of other institutions offering programs of study in construction,

...avoid appointment of visitors who may not be acceptable to an institution while retaining final authority in the formation of visiting teams....

Visiting Teams

Members of each on-site visiting team, with the concurrence of the institution to be visited, are selected by the Executive Vice President from a Register of Visitors previously submitted to and approved by the accreditation Committee. The team must be....

Consultants

Consultants [who have provided assistance to an institution in planning or developing a construction education program] will not be involved in any ACCE accreditation visit, action, or decision involving that institution during the time the institution is undergoing the accreditation process.

Conflict of Interest

1) Financial or Contractual Negotiations or Agreements Between ACCE and Other Entities

Officers and employees are forbidden from participating personally and substantially in corporate action with respect to any contract, transaction, or other matter in which, to the knowledge of any such officer or employee, he/she or any member of his/her immediate family has an interest, financially or otherwise, unless such officer or employee makes full disclosure of the circumstances to the Board of Trustees and the Board determines that the interest is not so substantial as to affect the integrity of the services of such officer or employee, or the interest is too remote or too inconsequential to affect the integrity of such services.

2) Appointments to, and Membership on, ACCE Bodies

Because it is important that program reviews and guidance given to institutions be impartial, all persons acting on behalf of ACCE as advisors,

visitors, and/or member of the Guidance and Accreditation Committees or Board of Trustees must disclose any past or present relationship with the program or institution being advised, visited or reviewed, w or with any persons involved in the program, direct or indirect, whether financial, professional, social or otherwise. further, if any such relationships arise during the course of a program advisory or review, such relationships also must be disclosed. Any doubt should be resolved in favor of disclosure. Such disclosures are to be made voluntarily or, if requested, in writing to the Executive Vice President.

If, in the opinion of the Executive Vice President, a given disclosure statement reveals the potential for conflict of interest, such statement shall be referred to the Executive Committee of ACCE for review and decision (and, if the disclosure is from a member of the Executive Committee, with the Vice President acting for the President if the disclosure is by the President). If the decision is that there is the potential for conflict of interest, the individual will be asked to absent himself/herself from any and all deliberation regarding the institution or program involved, or, in the case of a pending appointment -- e.g. as a member of a visiting team -- that appointment will not be made. There shall be no appeal from such decisions.

In the event that the potential for a conflict is disclosed to ACCE by other than the individual involved, the Executive Vice President shall query the person involved to verify the information received, and, thereafter, the same procedure for decision shall apply.

COMMISSION ON DENTAL ACCREDITATION
AMERICAN DENTAL ASSOCIATION

Reference/Source:

Evaluation Policies and Procedures, Commission on Dental Accreditation, Chicago, Ill., May 1990, pp. 6 and 7

Policy/Procedure:

Conflict of Interest: * Evaluation polices and procedures of the Commission on Dental Accreditation provide a system of checks and balances to ensure fairness and impartiality in all aspects of the evaluation process. Procedures for selection of representatives of the Commission (e.g. Commission members, consultants) who participate in site visits or serve on standing committees of the Commission reinforce impartiality. In addition, procedures for institutional due process, as well as strict guidelines for all written documents and accreditation decisions, further reinforce impartiality. Every effort is made to avoid conflict of interest, either from the point of view of an institution/program being reviewed or from the point of view of any person representing the Commission.

An institution/program has the right to reject the selection of any representative, Commissioner or staff member because of possible conflict of interest. For example, if there is reason to believe that a person representing the Commission might not objectively evaluate the program or if an individual is known to be a graduate, a consultant or former faculty member of the institution, the program administrator must so notify the Commission staff.

Conflicts of interest may also arise when the consultant or representative has a family member employed by or affiliated with the institution, or when that individual has served as a consultant or in some other official capacity at the institution. If for any reason there may be a conflict of interest, the Commission expects to be notified immediately by the institution, and also by the individual representing the Commission. In such cases, another consultant or representative is selected before the final composition of the site visit team is officially announced.

Whenever an institution or an individual representing the Commission is uncertain as to possible conflict of interest, Commission staff should be consulted as quickly as possible. The Chairman of the Commission may make a final determination to resolve any questions regarding real or perceived conflicts.

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* POLICY ON CONFLICT OF INTEREST ADOPTED BY THE ADA BOARD OF TRUSTEES STATES: Individuals appointed to a Council and/or Commission shall at all times act in a manner consistent with their responsibilities to the Association and shall exercise particular care that no detriment to the Association results from conflicts between their interests and those of the Association. If an individual believers that he or she may have a conflict of interest, the individual shall promptly and fully disclose the possible conflict of interest and shall refrain from participating in any way in the matter to which the possible conflict relates until such possible conflict has been satisfactorily resolved.

COUNCIL ON EDUCATION DIVISION OF EDUCATION ACCREDITATION/APPROVAL
AMERICAN DIETETIC ASSOCIATION

Reference/Source:

"ADA Conflict of Interest Policy Statement," Effective August 1989

Council on Education Division of Education Accreditation/Approval Governing Document, August 1990

Accreditation/Approval Manual for Dietetic Education Programs

Appeals Procedure for Members of the American Dietetic Association, Credentialed Dietetic Practitioners, Applicants, and Dietetic Education Programs Accredited or Approved by the American Dietetic Association, 1989

Policy/Procedures:

Provisions of Conflict of Interest Statement:

STATEMENT OF POLICY. All volunteers and staff of The American Dietetic Association shall avoid conflicts between their personal interests and the interests of the Association.

DISCLOSURE. If a volunteer or staff member is aware of any personal interest related to an issue that exists or is under consideration by the Association, the individual shall immediately and prior to the discussion about or action on the issue:

- disclose the existence of all personal interests; and
- abstain from voting and/or attempting to influence the decision.

The disclosure of personal interest shall be noted in the minutes of the meeting in which it is made and in the minutes of subsequent meetings at which the issue is discussed. If the individual is a voting member, the minutes will show that the individual abstained from voting.

DEFINITIONS.

1. Conflict of interest includes situations wherein a volunteer or staff member:

   - is involved in an ADA decision or action regarding another entity in which the volunteer or staff member has a financial interest, is an employee, is a director or is a consultant;

   - discloses information relating to the business of the Association which can be used by another entity.

2. The terms volunteer and staff member shall include the volunteer or staff member and any member of either the volunteer's or staff member's immediate family.

3. Other entities include any organization or individual which does business or seeks to do business with the Association or which competes with the Association in products or services.

GUIDELINES.

1. This policy shall be furnished to each officer and to each committee, council and staff member; printed in the State Associations Manual and the Manual of the House of Delegates; and included with the standing rules of the Board of Directors.

2. Volunteer and staff will use discretion in accepting gifts, entertainment or other favors from another entity. In general, they should be accepted only in the conduct of normal business functions.

Selected Provisions from Accreditation/Approval Governing Document:

Conflict of Interest

a. Members may not serve simultaneously on other groups within ADA that may represent a conflict of interest with accrediting activities (i.e., Board of Directors, CDR, other than Exam Review and Item Writing Panels).

b. Members may not serve as consultants to any developing or ongoing accredited/approved dietetic education program during their term of office.

Ethics

...Division and review panel members shall abide by the Code of Ethics for the Profession of Dietetics and the Standards of Practice.

...Division and review panel members cannot serve as consultants to any developing or ongoing dietetic education programs during their terms of office.

...Three years must elapse from the time a site visitor visits a program or a Division or review panel member reviews a program, before he/she may serve as a consultant to that program. Three years must elapse before a consultant for a program may serve as site visitor or reviewer for that program.

...If members of the Division and review panels function in any capacity that prejudices their services or decisions regarding accreditation/approval, they will be expected to abstain from participation in those accreditation/approval actions.

...Division and review panel members must be excused from accreditation/approval or other discussions when their own program is being discussed. The decision regarding the program should be disclosed only in an official decision letter.

...Division and review panel members shall not review programs which are, in their best judgment, a conflict of interest.

Procedures for Scheduling Site visitors

...Site visitors should decline a site visit which in their best judgment is a conflict of interest.

Reappointment of Site Visitors

...Persons who have apparent conflicts of interest with accrediting activities may not be appointed as site visitors.

Provisions from Accreditation/Approval Manual:

Scheduling -- Site Visitors

Site visitors are chosen by ADA staff, but the Program Director is asked to identify any site visitors who would have a conflict of interest, or for other reasons, would not be appropriate site visitors.

...A third factor considered is that of geographic location to avoid conflict of interest.

Provisions of the Appeals Procedure:

Appeals Committee Composition

The following individuals are ineligible to serve on the Appeals Committee: members of the Commission on Dietetic Registration; members of the Division, including all review panel members and site visitors; Headquarters staff; members of the Board of Directors; members of the Board of Directors of the ADA Foundation; and anyone who may have a conflict of interest as determined by the Board of Directors.

COUNCIL FOR ACCREDITATION
AMERICAN HOME ECONOMICS ASSOCIATION

Reference/Source:

Accreditation Documents for Undergraduate Programs in Home Economics, Revised May 1990

Policy/Procedures:

Guidelines for Selection of a Site Visit Team

...Each team member must be free of conflict of interest with regard to the unit under review. Conflict of interest includes such things as: past employee, current or former status as a student, service as a consultant, member of an earlier visiting team, and recent applicant for a position.

...A list of at least eight potential site visitors is sent to the home economics administrator for review.

...The administrator of the home economics unit has the opportunity to veto a maximum of two recommended site visitors. The institution does not have the option to name site visitors. The Director of Accreditation ;makes the final determination of site visitors...Team members are selected from among potential visitors approved by CFA and the institution.

COMMITTEE ON ACCREDITATION
AMERICAN LIBRARY ASSOCIATION

Reference/Source:

"Committee Policy: Conflict of Interest, a Guideline for Members of the ALA Committee on Accreditation," July 1988

"Committee Policy: Guidelines for Composition of a Site Visit Team," Revised March 1989

Manual of Procedures for Evaluation Visits under Standards for Accreditation, Revised 1988

Policy/Procedures:

Conflict of Interest Policy Statement Provisions:

Conflict of Interest: "Being in a position where your own needs and desires could possible lead you to violate your duty to a person who has a right to depend on you."*

In order to avoid a conflict of interest, members of the COA will not vote or participate in discussions concerning any institution with which they have a continuing interest characterized by teaching on a regular, adjunct, or visiting basis; serving as a consultant, trustee, administrator, or member of an advisory board; enrollment as a student; or a familial relationship with an individual in one of the above roles. Members of COA should terminate as soon as feasible all consulting activities with schools of library science. No new consulting activities related to library and information science education that would affect specific schools may be accepted during tenure on the Committee. Also, those members of the COA who have had any of the described relationships within the past three years with a program under review by the COA should abstain from participation in discussions of the programs in library science at these institutions and in voting on issues affecting these institutions.

If a member of the COA feels that any personal activities, events, or relationships may bias their views of any institutions or program under review by the Committee on Accreditation, the member should consider withdrawing from discussions and participation in voting. The COA may wish to advise that withdrawal is not necessary or in the best interests of the deliberations.

* Oran's Dictionary of the Law (St. Paul: West Publishing, 1983), p. 94

Selected Provisions from Guidelines for Team Composition:

The team members must be free of conflict of interest, such as those disqualified for reasons of past employment in the library school or the parent institution, status as a student, service as consultant to the program, member of an earlier visiting team, employment or residence in the state or province where the program is located.

Procedures Manual Provisions:

Application for Initial Accreditation Visit

...The COA determines by vote whether the self-study report is acceptable. Members of the COA who are currently employed by the parent institution of the library school under discussion, or who are currently enrolled in the institution, leave the meeting and may not participate in the discussion or the vote. Similarly, a COA member who has served in previous years as a consultant to the school, or who believes that there may be some other basis for a conflict of interest, leaves the meeting and does not participate in the discussion or the vote...

Consultant Ineligible for Visiting Team

Anyone who serves as a formal consultant to a school seeking accreditation or reaccreditation cannot serve on the visiting team to the same school when accreditation is under consideration by the COA.

COUNCIL ON OPTOMETRIC EDUCATION
AMERICAN OPTOMETRIC ASSOCIATION

Reference/Source:

Accreditation Manual: Professional Optometric Degree Programs

Policy/Procedures:

Composition, Selection and Financing of the Evaluation Team

Prior to formal appointment of evaluation team members by the Chairman of the Council, a list of the names of the proposed team members will be submitted to the institution being evaluated for its review and comment. If the institution finds a conflict of interest with respect to a proposed team member, or any other problem which might interfere with the objectivity of any proposed team member, the Council will take appropriate action to remedy the situation.

Council's Review of and Action on Evaluation Team Report

After receipt of the draft report from the institution, the evaluation team draft report with recommendations is submitted to the Council for consideration at its next regularly scheduled meeting ... The Council expects its members to withdraw from the consideration of the accreditation status of a program when the member or the Council feels that there may a conflict of interest.

Comment:

The Council expects to make the following present practices explicit in its accreditation manuals, at the next revision:

Council Members: Excuse themselves from the meeting if a program sponsored by their employing college is considered or discussed; abstain from voting for programs sponsored by their alma maters or former employers; refrain from serving as consultants to educational programs, or, seek the consent of the chair of the Council in outside activities;

Evaluation Teams: When arranging site visits, the staff checks with the college dean or president to review the list of potential site visitors to see if there is any perceived conflict of interest. The dean or president may challenge team composition if a conflict of interest exists, and the member with the conflict is replaced. When contacting potential team members, the staff routinely asks if they perceive any conflict of interest. This results in staff discussion with the team member about what constitutes a conflict of interest. Questions which are asked and answered include: Do you feel you have a conflict of interest? (Previously employed or denied employment by college, close personal relationship with dean or key faculty). Are there any factors which you believe would prevent you from evaluating the program objectively?

COMMITTEE ON COLLEGES, BUREAU OF PROFESSIONAL EDUCATION
AMERICAN OSTEOPATHIC ASSOCIATION

Reference/Source:

Board of Trustees Memo B, July/78-80

Accreditation of Colleges of Osteopathic Medicine, 1990

Policy/Procedures:

Board of Trustees Memo Provisions:

Conflict of Interest

The AOA Board of Trustees and Bureau of Professional Education have adopted the following policy that affects membership or official accreditation site visit teams. If for any reason you are aware of a personal or potential conflict of interest in your participation on this site visit, then please contact the AOA Office of Osteopathic Education.

The policy, as adopted in Memo B - July/78-80 is:

> RESOLVED, that it shall be the policy of the Committee on Colleges that the composition of official accreditation visiting teams for existing or newly developing colleges or osteopathic medicine shall exclude any person who currently serves on the Board of Trustees, the Administration, the Alumni Board, or the Faculty of the institution being evaluated or any person enrolled in said institution or any person who is known to be either personally or professionally closely allied to a person who serves in any of the above-listed institutional categories.
>
> Explanatory Statement: The purpose of establishing this policy is to eliminate any potential for allegations of a conflict of interest or undue influence involved in the accreditation process for colleges of osteopathic medicine.

Accreditation Manual Provisions:

[In regard to full surveys,]

...A team appointed to undertake a full survey shall consist of an adequate number of persons to address all of the Standards and shall include such consultants from outside the profession as the Bureau finds appropriate. Selection of members of the full survey team shall be made pursuant to procedures established by the Bureau and transmitted to each COM. The Bureau shall seek and receive the concurrence of the chief executive officer or chief administrative officer of the COM as to the composition of the team. In the event of an objection to a team member, a mutually approved substitution shall be made.

[In regard to an interim progress review,]

...The team appointed to undertake an interim progress review shall consist of persons identified as particularly qualified to examine progress made in the areas identified. Selection of members of the interim progress review team shall be made pursuant to procedures established by the Bureau and transmitted to each COM. The Bureau shall seek and receive the concurrence of the chief executive officer of the COM as to the composition of the team. In the event of an objection to a team member, a mutually approved substitution shall be made....

[In regard to a visitation required based on problems,]

...The visitation shall be undertaken by no more than two (2) evaluators appointed to examine the particular problem identified by the Bureau. Selection of evaluators shall be made pursuant to procedures established by the Bureau and transmitted to each COM. The Bureau shall seek and receive the concurrence of the chief executive officer of the COM as to the composition of the team. In the event of an objection to an evaluator, a mutually approved substitution shall be made....

COMMISSION ON ACCREDITATION IN PHYSICAL THERAPY EDUCATION
AMERICAN PHYSICAL THERAPY ASSOCIATION

Reference/Source:

1991 Accreditation Handbook

Policy/Procedure:

Conflict of Interest

A conflict of interest can arise when conditions or circumstances preclude or interfere with an individual's capacity to make the objective, detached decisions required in the accreditation process.

Conditions or circumstances which may create a conflict of interest include but are not limited to those cases in which the person authorized to participate in the accreditation program on behalf of CAPTE or APTA: 1) has a personal, professional, or financial interest in, or relationship with, the education program or institution in questions, including the personnel and enrolled students of the program or institution, 2) is an employee or consultant of the state institutional system (e.g. an institution that is funded from the same source) as the institution in question, 3) is a graduate of the program or institution in question, 4) is serving or has served recently, whether voluntarily or for pay,. as a consultant, advisor, or clinical or adjunct faculty to or for the program or institution in question, 5) lives or works in close proximity to the program or institution in question and has access to unofficial information on the program or institution, or 6) has or is perceived as having, for any reason, a preconceived bias for or against the program or institution in question, including the personnel and enrolled students of the program or institution.

Persons authorized to participate in the accreditation program on behalf of CAPTE or APTA shall excuse themselves from such participation in any case where a conflict of interest arises, where a potential conflict of interest may arise, or where there may be a perceived appearance of conflict. Such persons shall also refrain from engaging in personnel recruitment, job application, or job seeking activities or behaviors with respect to the education program or institution with which they interact officially in the course of the accreditation process involving that program or institution.

COUNCIL ON PODIATRIC MEDICAL EDUCATION
AMERICAN PODIATRIC MEDICAL ASSOCIATION

Reference/Source:

Operating Manual of Rules and Procedures, Revised August 1990

Procedures for Accrediting Colleges of Podiatric Medicine, February 1989

Constitution and Bylaws and Code of Ethics of the American Podiatric Medical Association, Amended August 1989

Policy/Procedure:

Operating Manual Provisions:

I. Conflict of Interest Statement

Conflicts Related to Employment/Appointment

The Council believes that a member of the Council must be free to make decisions without any undue pressure or perceived alliance to any organization or institution that the Council recognizes or to any political entity within the podiatric medical profession. In order to avoid potential conflicts of interest, the following restrictions have been established with respect to CPME members and committee members:

(1) A Council member may not accept a voting or ex-officio position on the governing board of a college of podiatric medicine or accept appointment as a chief executive officer of an institution offering the DPM degree.

(2) A Council member or committee member may not accept position of special consultant (paid or unpaid) to a college of podiatric medicine, institution with a podiatric residency program, certifying body in the podiatric profession, or any other educational program or entity accredited or otherwise recognized or seeking recognition by the Council or its committees. This statement is intended to preclude institutions or organizations from soliciting CPME ,members for the purpose of providing information that could be construed inappropriately as implying or suggesting CPME consultive advice or tacit approval of institutional/organizational activities.

(3) A Council member or committee member may not hold office on the APMA Board of Trustees. Also a Council member is precluded by the APMA Bylaws from seeking election to the Board of Trustees.

(4) No member of the APMA Board of Trustees may serve as an evaluator or consultant for CPME.

(5) No chief executive officer or member of the governing body of an institution offering the DPM degree may serve as an evaluator for CPME.

(6) A Council member may not serve as an elected or appointed delegate or alternate to the APMA House of Delegates.

Council members who obtain any of the above positions are required to forfeit their positions on the Council, in writing, immediately. No waivers of the above restrictions are permitted.

Conflicts Related to the Conduct of Council or Committee Business

The following restrictions pertain to Council and committee member conflicts that interfere with objectivity in making decisions at meetings, or in mail ballots or conference calls:

(1) A Council member or committee member who is affiliated in an official capacity with a college of podiatric medicine,residency program, continuing education program or podiatric assistant's program must excuse him/herself from all deliberation when his/her institution or program ;is being considered.

(2) A Council member or committee member must abstain from discussion and voting on any matter pertaining to a program, institution or organization for which he/she has served as an on-site evaluator. The member is allowed to provide information to clarify statements in reports regarding on-site evaluations completed upon request of the Council or committee chairperson.

K. Evaluator Appointments, Training and Assessment

Appointments to Evaluation Teams

Individuals who are appointed to serve on specific evaluation teams are responsible for informing the Council or JRRC of possible conflicts of interest. The institution to be evaluated also has a responsibility to identify conflicts of interest and request that a certain team member(s) be replaced. The Council will do all that is reasonably fair in replacing individuals provided a clear conflict of interest can be identified by the institution.

Accrediting Procedures Provisions:

Composition of the Evaluation Team

...The Council will not appoint members to the evaluation team who have any conflict of interest in the evaluation of the institution, including graduates, and current and former faculty members or administrators of the institution.

APMA Bylaws Provisions:

Chapter VIII, Section 1, Council on Podiatric Medical Education, B. Composition, (6) Limitations on Office Holders

No member elected to the Council on Podiatric Medical Education Shall be, or during his/her term of office on the Council become, a member of the governing board of a college of podiatric medicine, or serve as a consultant to a college of podiatric medicine, residency program or other approved educational program and, upon obtaining such an appointment, shall be deemed to have forfeited his/her position on the Council. No member while serving on the Council on Podiatric Medical Education shall hold office on or seek election to this associations Board of Trustees.

COMMITTEE ON ACCREDITATION
AMERICAN PSYCHOLOGICAL ASSOCIATION

Reference/Source:

Accreditation Handbook

Accreditation Procedures, August 1980

Policy/Procedures:

Accreditation Handbook Provisions:

Selection of a Site Visitor

The Accreditation Office maintains a list of several hundred potential site visitors. This list is updated each summer by asking those already on it about their willingness to continue to serve. The program forming a site visiting team is normally offered some choice from among names drawn from the list...In preparing the list of visitors, the Committee and staff attempt to avoid even the appearance of a conflict of interest with the program. This is absolutely necessary in order to maintain the credibility of the accreditation process. However, all relationships between individuals and programs cannot be known by the Committee and staff. The responsibility to determine any possible conflict, actual or apparent, lies equally with the program and the site visitors. Examples of possible conflicts of interest are

- former employment at the program;
- having been a former student at the program;
- family connection with the program;
- having an "old" friend at the program;
- having a former classmate on staff at the program; or
- having a close professional acquaintance with a member of the staff at the program.

On receipt of the lists from the Accreditation Office, programs contact the individuals they choose and arrange mutually convenient dates for the visit. The program also informs the Accreditation Office of the names of the visitors and the date of the visit at least four weeks prior to the visit, so that staff can mail necessary materials to the visitors.

Procedures Provisions:

Committee on Accreditation

...Membership The Committee shall consist of not less than 10 members appointed by the Education and Training Board, for staggered three-year terms, of whom one member shall be elected by the Committee as chairperson. The membership of the Committee shall include at least two public members who are not psychologists or members of the APA and psychologists representative of the types of programs currently being accredited. Psychologists who serve on evaluation committees or other bodies that recommend the award of funds to psychological programs that have or may seek APA accreditation should not accept concurrent membership on the Committee.

...Avoidance of Conflict of Interest Should a member of the Committee be in possible conflict of interest with respect to any program scheduled for review by the Committee at any particular meeting, that member will be excused during discussion and decision on that program. Further, the Committee may, in its judgment, determine that a member is in possible conflict of interest and ask that member to withdraw from discussion of and decision on a particular program.

AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS

Reference/Source:

Accreditation Procedures, Revised February 1990

Policy/Procedures:

Visiting Team Selection

...Teams are selected to avoid possible conflicts of interest. For example, a previous affiliation with the program under review, or an affiliation with a program in the same geographic location with competing enrollments, monies, etc., renders an evaluator ineligible.

The program is advised of the proposed team, including each proposed team member's present position, experience and areas of expertise. The program has the right to challenge one team member, with cause. For the purpose of challenge, conflict of interest can be cited if the nominee comes from the same geographic location and is affiliated with a competitive institution; the nominee had a previous affiliation with the institution; the institution can demonstrate that the nominee is not competent to evaluate the program. Though the final decision on team assignments rests with the LAAB chair, it is unlikely that a challenged team member will remain on the team.

COUNCIL ON EDUCATION
AMERICAN VETERINARY MEDICAL ASSOCIATION

Reference/Source:

AVMA Council on Education Accreditation Policies and Procedures, August 1990

Policy/Procedures:

Site Visit Team Selection

...Members of the Council are not eligible for site visit teams assigned to colleges of which they are graduates or employees....

Accreditation Action

...A Council member who is an employee of the college under consideration absents himself/herself from the room during discussion that lead to accreditation actions....

ASSOCIATION OF AMERICAN LAW SCHOOLS

Reference/Source:

American Bar Association and Association of American Law Schools Statement on Good Practice on Impartiality and Propriety in the Process of Law School Accreditation, Adopted December 1977

Policy/Procedures:

Adopted by the Executive Committee, December 27, 1977 and by the Council, American Bar Association, Section of Legal Education and Admissions to the Bar, December 10, 1977:

A. Those who have significant responsibility in the process leading to accreditation of law schools serve a vital and quasi-judicial function in the legal system of the United States. It is important to the fair and effective functioning of the system of law-school accreditation and to the maintenance of public and professional respect for that system that those who act in it act impartially and avoid even the appearance of impropriety.

B. One who has significant responsibility in this system or who has had significant responsibility in this system within a period of two years, as enumerated in paragraph "D" below, should not serve as a consultant to a law school in any matter relating to:

1. accreditation by the American Bar Association;

2. membership in the Association of American Law Schools; or

3. reinspection and continuation of American Bar Association accreditation or membership in the Association of American Law Schools.

C. This restriction applies to service as consultant whether or not that service is for compensation. It does not apply to informal advice which an advisor renders (i) without fee, (ii) informally, and (iii) which he or she discloses fully to the other members of the accreditation or membership body on which he or she serves or has served; nor does it apply to the routine or official advice and assistance which is rendered by members of an inspection team or hearing commission, by the Consultant on Legal Education to the American Bar Association, by the Executive Director of the Association of American Law Schools, or by persons acting on behalf of the Consultant or Executive Director, or (iv) by a person acting in the normal course of his or her employment.

D. This restriction applies to:

1. members of the Accreditation Committee of the Council on Legal Education and Admissions to the Bar of the American Bar Association;

2. the President, other Officers, members of the Board of Governors, and members of the Council of the Section of Legal Education and Admissions to the Bar of the American Bar Association;

3. members of the Accreditation and Academic Freedom Committees of the Association of American Law Schools;

4. the President and members of the Executive Committee of the Association of American Law Schools;

5. members of the professional staff of the American Bar Association or the Association of American Law Schools, except as provided in paragraph "C" above;

6. a member of an inspection team or hearing commission for either Association respecting appointment as a consultant to a law school that he or she has inspected or conducted hearings on, on behalf of either Association within two years after the inspection or while either Association still has under consideration matters developed by the inspection, whichever is the longer;

7. the Executive Director of the Association of American Law Schools or other person acting on behalf of the Association of American Law Schools may not acquiesce in the appointment as consultant on readiness of any person who by the Statement should not accept appointment as a school's consultant.

E. Service as a consultant for a law school does not disqualify a person from any of the offices or committees in paragraph "D". However, the officer or committee member should excuse himself or herself from participation in discussion, formal or informal, of the affairs of a school which he or she has served as consultant or employee, and from taking part in any vote with respect to its status.

F. A person who has served as a consultant or employee of a law school within two years prior to assuming a significant responsibility in the accreditation process should decline to participate in the determination of the accreditation status of the school with which he or she previously served.

G. The Consultant on Legal Education to the American Bar Association, Executive Director of the Association of American Law Schools, or either of them if they are acting cooperatively, shall bring this regulation to the attention of persons who are nominated for or appointed to any of the positions enumerated in paragraph "D" above and to all persons who are holding these positions or who have held them within two years past, at the time the regulation become effective.

COMMITTEE ON ALLIED HEALTH EDUCATION AND ACCREDITATION
AMERICAN MEDICAL ASSOCIATION

Reference/Source:

Policies and Procedures Manual

Policy/Procedures:

Conflict of Interest

Policy Statements

...Members of the Committee on Allied Health Education and Accreditation (CAHEA), review committees, and staff must refrain from participating in the discussion or vote on accreditation matters if for any reason a conflict of interest or the appearance of a conflict of interest can arise. Minutes of meetings must reflect this non-participation.

...Other persons involved in the accreditation review process must withdraw from participation in that process if for any reason a conflict of interest or the appearance of a conflict of interest can arise.

...Members of CAHEA and staff shall not serve as private consultants* to any program subject to CAHEA accreditation.

Provisions to Avoid Conflict of Interest in the Site Visit Process

Site visitors who are competent to participate in the accreditation review process by virtue of their experience, training, and orientation are presented with opportunities to provide information to and receive information from faculty, staff, administrators, students, and other parties. Reasonable precautions are taken to ensure that site visitors develop and express objective opinions and decisions, free of self-interest and personal bias.

Persons should not serve as site visitors for a program if they

- are employed in the proximity of the sponsoring institution;
- have recently been appointees of, employees of, or consultants to, the sponsoring institution, or have relatives who are appointees or employees of the sponsoring institution;
- are recent graduates of the sponsoring institution; or
- are not acceptable to the program.

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*Private consulting means providing advice on accreditation to a specific program for personal gain, not to be confused with providing such advice without personal gain in the course of fulfilling normal position responsibilities. When questions arise regarding the specific applicability of the policy, the matter shall be submitted to CAHEA for resolution.

Adopted by the Committee on Allied Health Education and Accreditation, January 1984; revised July 1984

CAHEA Review Committee:

ACCREDITATION REVIEW COMMITTEE ON EDUCATION FOR PHYSICIAN ASSISTANTS

Reference/Source:

CAHEA Policy and Procedure Manual

Policy/Procedures:

See CAHEA Statement

CAHEA Review Committee:

AMERICAN MEDICAL RECORD ASSOCIATION

Reference/Source:

CAHEA Policy and Procedure Manual

AMRA Panel of Accreditation Surveyors Handbook, 1989

Policy/Procedures:

General Policies

...The Council shall operate in accordance with the CAHEA policy on conflict of interest in all its activities. (COE 4/84)

Assignment of Survey Sites

...Surveyors will be assigned to sites in their geographical region whenever possible. An attempt will be made to avoid assignment within the surveyor's state of residence.

General Duties

...The Director of the Academic Division will assign survey sites to Panel members based on their years of service, using the instructions outlined under Assignment of Survey Sites. AMRA surveyors should decline to survey those programs which in their opinion could create a conflict of professional ethics.

Also, program directors may request that another surveyor be appointed by the Academic Division when in their judgment a conflict of interest exists between the assigned survey and the program. However, the decision regarding the assignment of surveyors will rest with the Academic Division.

CAHEA Review Committee:

JOINT REVIEW COMMITTEE FOR RESPIRATORY THERAPY EDUCATION

Reference/Source:

CAHEA Policy and Procedure Manual

Policy/Procedures:

See CAHEA Statement

CAHEA Review Committee:

JOINT REVIEW COMMITTEE ON EDUCATION IN CARDIOVASCULAR TECHNOLOGY

Reference/Source:

CAHEA Policies and Procedures Manual

Policy/Procedures:

See CAHEA Statement

CAHEA Review Committee:

JOINT REVIEW COMMITTEE ON EDUCATION IN DIAGNOSTIC MEDICAL SONOGRAPHY

Reference/Source:

CAHEA Policies and Procedures Manual

Policy/Procedures:

See CAHEA Statement

CAHEA Review Committee:

JOINT REVIEW COMMITTEE ON EDUCATIONAL PROGRAMS IN NUCLEAR MEDICINE TECHNOLOGY

Reference/Source:

CAHEA Policy and Procedure Manual

"Conflict of Interest Statement," JRC on Educational Programs in Nuclear Medicine Technology

Policy/Procedures:

The Joint Review Committee on Educational Programs in Nuclear Medicine Technology (JRCNMT), in an effort to insure that its administrative, consultative and decision-making personnel are not biased in their judgements or decisions by services they perform, or may have performed for other institutions or organizations in the last two years, subjecting educational programs to possible conflicts of interest, requests each committee member and site surveyor to submit the following information:

1) Are you a full or part-time employee of any commercial organization which might benefit from contacts you have as JRCNMT member or site surveyor? If so, please state the name of the employer, the capacity in which you are employed, and whether it is part-time or full-time.
2) Are you employed by any hospital or institution which currently has an application pending for accreditation of an educational program in nuclear medicine technology? If so, please state the name of the hospital or institution.
3) Do you own any stock, or have any financial interest in organizations whose interests might be in conflict with the JRCNMT?
4) Are there situations in which decisions you make as a member of the JRCNMT or site surveyor, might be construed as in the promotional interest of some other organization? If so, please explain.
5) Are any members of your immediate family involved in any of the situations covered by questions 1, 2, 3, or 4? If so, please give the name and relationship of the party, and pertinent information.
6) Is there any situation not disclosed above which could be construed as placing you in a position of having a conflict of interest with the JRCNMT? If so, please state briefly the facts with respect thereto.
7) Are you attempting to enter into any relationship, which, if in existence at this time, would be covered by any of the foregoing questions, or do you have any reason to believe that, within the ensuring year, you will or might be in a situation covered by any of the foregoing questions? If so, please explain.

It is understood that you will not accept any assignments on behalf of the Joint Review Committee on Educational Programs in Nuclear Medicine Technology for the evaluation of a program's merit in which your judgement might be construed as being biased due to any personal or business relationship.

CAHEA Review Committee:

NATIONAL ACCREDITING AGENCY FOR CLINICAL LABORATORY SCIENCES

Reference/Source:

NAACLS Policy and Procedure Manual

Policy/Procedures:

Conflict of Interest Policy Statement (Also see Conflict of Interest Policy Statement Certificate and NAACLS Questionnaire - Appendix, pages 1-3.)

Members of the NAACLS Review Board, programs review committees and staff must refrain from participating in the discussion or vote on accreditation matters if a conflict of interest or the appearance of a conflict of interest exists. Minutes of meetings must reflect this non-participation.

Other persons involved in the accreditation review process (such as site visitors or self-study document paper reviewers) must not participate in the process if a conflict of interest or the appearance of a conflict of interest exists.

Current members of the Review Board, programs review committees and staff shall not serve as private consultants* to any program subject to NAACLS/CAHEA accreditation or NAACLS program approval.

Members of the Review Board and programs review committees cannot jointly serve on the board of directors of a NAACLS sponsoring or participating organization or agency that certifies clinical laboratory science professionals or other agencies/organizations that accredit clinical laboratory science education programs.

Provisions to Avoid Conflicts of Interest in the Site Visit and Self-Study Document Paper Review Processes

Site visitors and self-study document paper reviewers who participate in the accreditation process by virtue of their experience, training and orientation are presented with opportunities to provide information to and receive information from faculty, staff, administrators, students and other parties. Reasonable precautions are taken to insure that site visitors and paper reviewers develop and express objective opinions and decisions, free of self-interest and personal bias.

Persons may not serve as site visitors or self-study document paper reviewers for a program if they:

1. Are employed in the proximity of the sponsoring institution.
2. Have recently been appointees of, employees of or consultants to the sponsoring institution, or have relatives who are appointees or employees of the sponsoring institution.
3. Are recent graduates of the sponsoring institution.
4. Are not acceptable to the program.

*Private consultants are paid to advise program officials on aspects of accreditation.

COMPUTER SCIENCE ACCREDITATION COMMISSION
COMPUTING SERVICES ACCREDITATION BOARD

Reference/Source:

Conflict of Interest Policy Statement, dated June 24, 1990

Policy/Procedures:

The Computing Sciences Accreditation Board (CSAB), including its Computer Science Accreditation Commission (CSAC), is a non-profit organization, entirely motivated and guided by its strong commitment to continuously improve the quality of computer science education and to increase the awareness of the profession in the consciousness of its public, which includes the professional cadre, the public at large, the student population and the total academic, governmental and industrial standards of excellence and conduct beyond any reproach, and in line with the policies stated by its governing body, its member organizations (IEEE-CS and ACM). The U.S. Department of Education and the Council on Postsecondary Accreditation (COPA). In all instances, it is incumbent upon any person associated with CSAC/CSAB to make full disclosure to the Executive Director of any interest or course of action which might appear to bring about a conflict. The Executive Director of any interest of course of action which might appear to bring about a conflict. The Executive Director will initiate an internal review to determine any violation of organization policies.

This organizational responsibility, in order to be credible and effective, must become the code of conduct of the CSAB staff, its officers and Board of Directors and its Commission volunteers. The basic principle of undivided loyalty shall be observed and adhered to at all times in the conduct of the organization's business. Each should be continually aware of the organization's high standards of conduct and alert to recognize or anticipate the potential situations in which they must be applied. Specifically, no action should be suggested or taken, or any relationship entered into, which is contrary to these standards. The following is extracted from the COPA Handbook and expresses our own code of conduct:

> "No member of an accrediting commission or committee should participate in any way in accrediting decisions in which he has a pecuniary or personal interest or with respect to which, because of present institutional or program association, he has divided loyalties or conflicts on the outcome of the decision; provide that this restriction is not intended to prevent participation in decision-making in the general run of cases which does not directly or substantially affect the institution or program with which he is associated or its competitive position with a neighboring institution or program under review".

COUNCIL FOR ACCREDITATION OF COUNSELING AND RELATED EDUCATIONAL PROGRAMS
AMERICAN ASSOCIATION FOR COUNCIL AND DEVELOPMENT

Reference/Source:

CACREP's Accreditation Procedures Manual, 1988

Policy/Procedures:

Council Deliberations and Voting Procedures

In the final Council voting and discussion on each institution visited, no Council member will be present for deliberation on any institution in which that person is either a faculty member, member of the on-site visitation team, or otherwise has a conflict of interest.

Team Selection Procedures

To hold down expenses, geographical location will be considered when selecting the team. One team member may be selected from within the applicant institution's state, as long as the member is not employed by the said institution. In no case, however, will the team chair be employed in the same state in which the institution is located.

COUNCIL ON ACCREDITATION OF NURSE ANESTHESIA EDUCATIONAL PROGRAMS

Reference/Source:

Accreditation Policies and Procedures, August 1990

Policy/Procedures:

Policy Statement on Conflict of Interests

1. The U.S. Department of Education (USDE) and the Council on Postsecondary Accreditation (COPA) require that evaluators and decision makers involved in the accreditation process be free of any conflict of interests which could deter them from making impartial and objective accreditation reviews.

   Persons performing any evaluative or decision-making function for the Council must guard against conflicts of interests. As a means of guarding against such conflicts of interest, it is the Council's policy that no person, representative of the Council, may participate in an accreditation wherein he or she: 1) has graduated, been employed, or held practice privileges; 2) served as a consultant; 3) has a pecuniary interest; 4) has any close personal or professional relationships; 5) has a particular bias for or against the program or individuals conducting or administering the program, and/or 6) holds concurrent position having competing duties or responsibilities to those of the Council.

   The Council's policy with regards to conflict of interests applies to Council members, on-site reviewers, Council consultants, and staff when performing Council business.

2. Affirmative action policy

   The Council will attempt to choose public members to reflect the population at large, taking care that disenfranchised groups are given special attention (the elderly, poor, etc.)

Team Composition

...For cause, the institution/program to be reviewed may request that a substitution be made for one member of the team scheduled to review its program. The selection of the substitute visitor shall be approved by the chairman, Council on Accreditation.

COUNCIL ON EDUCATION FOR PUBLIC HEALTH

Reference/Source:

Accreditation Procedures, amended June 1990

Policy/Procedures:

Selection of Site Visit Teams

Schools are advised of the proposed team composition and provided an opportunity to identify any conflicts of interest. If a conflict of interest exists, CEPH will seek a replacement for that team member....

CEPH Decisions

...Councilors who have a conflict of interest in relation to the school or program under review are expected to abstain. For example, current or previous employment by the school or program, active alumni status, and other relationships would require an abstention.

COMMISSION ON STANDARDS AND ACCREDITATION
COUNCIL ON REHABILITATION EDUCATION

Reference/Source:

CORE Policy and Procedures Manual, October 1990

Policy/Procedures:

Appeals

...The appeal will be forwarded by CORE to an Appeal Panel of three individuals. The Panel must be neutral individuals who have in no way been involved in the program or the decision making process leading to the decision to not grant recognition....

Comment:

Although CORE does not have an explicit policy related to conflicts of interest as they relate to the initial review process, several practices of the organization are intended to help minimize or avoid conflicts. For example, a conflict of interest form is distributed to all members of the Council on Rehabilitation, the Commission on Standards and Accreditation and all Associate Commissioners, asking them to identify any connection, past or present, with the institution the rehabilitation counselor education program, or the coordinator of the program.

In addition, during a later phase of the review the three reviewers on the review committee work independently on their initial review reports of self-study descriptive program information and computer analysis of program data. These independent analyses are later combined into a consolidated report which may include additional information gathered by the chair or the program coordinator and which deals with any problems in the independent reports.

FOUNDATION FOR INTERIOR DESIGN EDUCATION RESEARCH

Reference/Source:

FIDER Accreditation Manual
FIDER Visiting Team Handbook

Policy/Procedure:

Manual Provisions:

Conflict of Interest

Those serving FIDER as Trustees or in any other capacity may not participate, in any way, in accrediting decision in which he or she has a pecuniary or personal interest, or because of present institutional program association, may have divided loyalties or conflicts on the outcome of the accrediting decisions.

The Visiting Team

Upon receiving an applicant for accreditation, the Chairman of the Accreditation Committee and the Director of Accreditation schedule the accreditation visit, suggest dates and propose Visiting Team members in consultation with the program correspondent.

Handbook Provisions:

Preparations for the Site Visit

FIDER staff and the Chairman of the Accreditation Committee will determine a tentative Visiting Team for each program...If the coordinator of the program requests a change in the proposed Visiting Team composition, that request will be honored when possible. No reason for such a request is required. The decision regarding the final composition of the Visiting Team will be the responsibility of the Chairman of the Accreditation Committee.

LIAISON COMMITTEE FOR MEDICAL EDUCATION
American Medical Association/Association of American Medical Colleges

Reference/Source:

Rules of Procedures, Revised February 1989

Policy/Procedures:

Code of Ethics for LCME Members and Staff

In order to avoid actual conflicts of interest or the appearance of such conflicts, the following procedural standards have been adopted.

1. No LCME member will participate in the deliberations or vote on:

   a. a school with which the member has recently been connected as a student, faculty member or officer;

   b. another school in the member's system or located in the same state;

   c. a school with which the member's school has substantial cooperation or contractual arrangements;

   d. a school which has engaged the member as a consultant within a period of three years prior to the action.

2. No LCME member or staff member will act as a consultant to any school subject to LCME accreditation on matters related to accreditation unless it is done in the name of the LCME and under its auspices. (Consultations unrelated to accreditation are governed by rule 1.d. above.)

3. No LCME member or staff member will, without the prior notification and concurrence of the Secretary and Chairman, participate in the evaluation of any institution or program not subject to LCME accreditation where such evaluation has as its purpose the recognition of the institution or program by any governmental or educational body within the United States. In each such case, the Secretary is instructed to insert the particulars of the project in the agenda of the next regular meeting of the Committee.

4. These standards refer only to activities related to specific institutions under review. They are not intended to preclude participation by LCME members or staff in meetings or seminars where accreditation standards, policies or procedures are a topic of general discussion or consideration.

5. The terms consultant and consultation as used in this document specifically do not include the provision of short-term educational services as, for example, guest lecturer, but are intended to include the provision of advice on such matters as program development or evaluation, organizational structure or design, and institutional management or financing.

NATIONAL ACCREDITATION COMMISSION FOR SCHOOLS AND COLLEGES OF ACUPUNCTURE AND ORIENTAL MEDICINE

Reference/Source:

Handbook of Accreditation

Manual for a Site Visit

"Practices to Avoid: Conflict of Interest"

Policy/Procedures:

Handbook Provisions:

Appointment of Site Visit Teams

The Commission shall appoint a pool of individuals willing to serve as members of site visit teams. Members of the site visit team pool shall serve in their personal and individual capacities and carry no implication of participation by any institution or other organization by which that person may be employed, a member or otherwise associated....

The Commission shall notify the program of the proposed site visit team members. The program shall, within a time set by the Executive Director, notify the Commission of any objection to the proposed site visit team members. Any member objected to for reasonable cause shall be replaced. The program may not object to any substitute site visit team member who have been replaced at the program's request.

Determination of Accreditation

A Commissioner may neither vote on nor review his or her own program, a program located in his or her immediate geographic proximity, or any other program with which S/he may have a conflict of interest. Commissioners, staff and site visitors must disclose any existing or apparent conflict of interest on an issue before the Commission....

The Appeals Process

Within 30 days of the date of denial of reconsideration, an institution may file with the Executive Director a written request that an outside arbitrator, who shall not have had any thing to do with the decision being appealed and who shall be mutually agreeable to the program and the Commission, review the action of the Commission. This request shall be signed by the Chief Executive Officer of the institution. The review shall be limited to a determination of whether the Commission has adhered to the process set forth in this document.

The Commission shall propose three arbitrators of whom the institution shall select one. If an institution rejects all three proposed arbitrators, the American Arbitration Association shall be utilized for the selection of the arbitrator familiar with education and education administration....

Provision of Manual for a Site Visit:

In an effort to guard against conflict of interest, the visiting team is constructed so that:

1. no member of the team will currently be from the program's same geographic area;

2. no member of the team will have been a recent employee or appointee of the program or the sponsoring institution or will have close relatives who are appointees or employees;

3. no member of the team will have been a graduate of the program;

4. no member of the team has publicly expressed opinions bearing on the accredibility of the program.

A list of the proposed visiting team members is sent to the program for comment before inviting the visiting team members to serve. Visiting team members are asked to refuse a team invitation if any conflict of interest may be possible. If changes in the team must be made, the program director or consulted.

Provisions Cited in Practices to Avoid:

Controls against conflicts of interest The Commission's determination to avoid any potential conflicts of interest in its evaluation mechanisms and decision-making roles is reflected in certain participation prohibitions such as program review, discussion and vote when a conflict or potential conflict of interest exists.

1. Commission members, staff and site visitors must disclose programs and issues with which a potential or apparent conflict of interest exists before assignments are made to review Eligibility Reports and Self-study Reports, attend site visits and/or take Commission action on a program.

2. If a Commission member is from the program being evaluated, is or was an employee of it, is involved with another program in the same geographical area or has special knowledge of, a special relationship with or any other potential conflict of interest with the program seeking candidacy or accreditation, he/she must abstain or yield the floor when review, discussion and vote take place on such a program.

3. Commission members may not be involved in both personal advisory services relative to programs and institutional development and in evaluation services relative to acupuncture accreditation.

Abstentions by Commissioners on final actions and discussions are recorded in the meeting minutes. Commission controls to avoid conflicts of interest are stated in the HANDBOOK p. 37.

The Commission meetings, which are open to the public, have times scheduled when executive session takes place for the purpose of further discussion and

decision-making on a program. This information is found in the HANDBOOK, page 3, section 1.1.2.

The Commission considers some if its due process procedures ones that also help prevent conflicts of interest. The appeals procedure, found in the HANDBOOK on p. 43 includes a provision for the American Arbitration Association, A.A.A., to be utilized for the selection of an arbitrator familiar with education and with the procedures of the A.A.A. For further efforts to ensure objective evaluations, the site visit teams must include at least one member who is not a member of the Commission.

NATIONAL ARCHITECTURAL ACCREDITING BOARD

Reference/Source:

NAAB Criteria and Procedures, January 1988

Policy/Procedures:

Team Selection

The team generally consists of four members, one each from the ACSA, AIA, NCARB, and AIAS. The NAAB selects the team and submits the list to the school. The school may question the appointment of team members where a conflict of interest arises. The selection of the chairperson is at the discretion of the NAAB. The Board will consider all challenges.

For the purpose of challenge, conflict of interest can be cited if:

- the nominee comes from the same geographic location and is affiliated with a competitive institution;
- the nominee has had a previous affiliation with the institution; or
- the school can demonstrate that the nominee is not competent to evaluate the program.

COMMISSION ON ACCREDITATION
NATIONAL ASSOCIATION OF SCHOOLS OF ART AND DESIGN

Reference/Source:

NASAD 1989-1990 Handbook

Procedures for Institutional Membership: NASAD, September 1988

"A Philosophy for Accreditation in the Arts Discipline," March 1986, a Joint Statement of National Association of Schools of Music, National Association of Schools of Art and Design, National Association of Schools of Theatre, and National Association of Schools of Dance

Policy/Procedures:

Handbook Provisions:

Protocols

Although the above procedure [related to commission membership] ensures that a broad range of individual, institutional and organizational perspectives will be present in the membership of the Commission, once elected, members of the Commission shall act as individuals in accordance with the standards and interests of NASAD. In conducting the business of Commission, they shall not serve as representatives of types of institutions or other organizations, however defined. They shall hold in confidence the actions of the Commission and the discussions leading to them.

Procedural Provisions:

Selection of the Visiting Evaluators

...the Executive Director of NASAD nominates a proposed slate of visiting evaluators...Following receipt of this slate, the institution indicates an order of preference and whether any suggested evaluators are unacceptable.

Provisions in the Joint Statement on Philosophy:

NASM, NASAD, NAST and NASD also share a common approach to delineation of responsibilities within the accreditation process, in addition to avoiding conflicts of interest, assignment of specific roles ensures that the accreditation process is fair and consistently applied from institution to institution and program to program. Essentially these roles are as follows:

- The membership determines standards and guidelines for accreditation in consultation with a broad range of applicable constituencies. Each member institution volunteers to prepare a self-study and to be reviewed against these standards.

- On-site evaluators review the institution's self-study and the operating program of the institution as fact-finders for the accrediting commission.

- The accrediting commission reviews all materials developed in the process and makes an accreditation decision on behalf of the Association.

- The Board of Directors and its Executive Committee serve as policy development and review bodies particularly concerned with mechanisms for reviewing and developing the overall effectiveness of the accreditation process. These groups establish and monitor procedures for formulating and revising standards and conduct all business of the Association to provide an supportive context for the accreditation effort. The Board of Directors also acts as an appeal body in matters of accreditation.

- The staff is responsible for managing the accreditation process, and for ensuring that all procedures, policies, and operations are carried out fairly and in accordance with association practice. The staff does not engage in evaluations or programs, nor does staff take overt responsibility for operating the accreditation process at specific institutions. However, the staff is responsible for providing consultative services when requested to do so, and is involved extensively in the development of literature, workshops, and other services to assist institutions in structuring their own uses of requisite accreditation procedures.

This delineation of responsibilities whereby institutional members, Boards of Directors, and Executive Committees exercise policy functions, Commissions exercise accreditation review functions, and Staff exercises procedural management functions produces an accreditation system that historically has been rigorous, yet almost totally free of conflict. Simultaneously, the system produces outstanding specific results as well as long-term growth in the capabilities of arts programs in higher education.

Comment:

In practice, conflict of interest is mentioned at the beginning of every accreditation Commission meeting and at every public meeting where accreditation is discussed. Individuals are asked to avoid undertaking accreditation responsibilities where they have close personal relationships, either positive or negative, with individuals involved, or where they have served as a faculty member, a recent consultant, etc. Commission members may not be present when the Commission discusses the institution with which they are affiliated.

Conflicts of interest are addressed during training workshops conducted at annual meetings and staff monitors all evaluators' backgrounds and invitations.

COMMISSION ON ACCREDITATION, COMMISSION ON COMMUNITY/JUNIOR COLLEGE ACCREDITATION, COMMISSION ON NON-DEGREE-GRANTING ACCREDITATION
NATIONAL ASSOCIATION OF SCHOOLS OF MUSIC

Reference/Source:

NASM 1989-1990 Handbook

Procedures for Institutional Membership: Baccalaureate and Graduate Degree-Granting Institutions, NASM, September 1988

"A Philosophy for Accreditation in the Arts Discipline," March 1986, a Joint Statement of National Association of Schools of Music, National Association of Schools of Art and Design, National Association of Schools of Theatre, and National Association of Schools of Dance

Policy/Procedures:

Handbook Provisions:

Though the above procedure [related to nominating members to the commissions] insures a broad range of institutional perspectives, once elected, members of the Commissions shall act as individuals in accordance with the standards, procedures, and interest of the Association. In conducting the business of Commissions, Commission members serve the interests of the Association. They shall not serve as representatives of types of institutions, regions, or other organizations, however defined. They shall hold in confidence the actions of the Commissions and the discussions leading to them.

Procedural Provisions:

Selection of the Visiting Evaluators

...the Executive Director of NASM nominates a proposed slate of visiting evaluators...Following receipt of this slate, the institution indicates an order of preference and whether any suggested evaluators are unacceptable.

Provisions in the Joint Statement on Philosophy:

NASM, NASAD, NAST and NASD also share a common approach to delineation of responsibilities within the accreditation process, in addition to avoiding conflicts of interest, assignment of specific roles ensures that the accreditation process is fair and consistently applied from institution to institution and program to program. Essentially these roles are as follows:

- The membership determines standards and guidelines for accreditation in consultation with a broad range of applicable constituencies. Each member institution volunteers to prepare a self-study and to be reviewed against these standards.

- On-site evaluators review the institution's self-study and the operating program of the institution as fact-finders for the accrediting commission.

- The accrediting commission reviews all materials developed in the process and makes an accreditation decision on behalf of the Association.

- The Board of Directors and its Executive Committee serve as policy development and review bodies particularly concerned with mechanisms for reviewing and developing the overall effectiveness of the accreditation process. These groups establish and monitor procedures for formulating and revising standards and conduct all business of the Association to provide an supportive context for the accreditation effort. The Board of Directors also acts as an appeal body in matters of accreditation.

- The staff is responsible for managing the accreditation process, and for ensuring that all procedures, policies, and operations are carried out fairly and in accordance with association practice. The staff does not engage in evaluations or programs, nor does staff take overt responsibility for operating the accreditation process at specific institutions. However, the staff is responsible for providing consultative services when requested to do so, and is involved extensively in the development of literature, workshops, and other services to assist institutions in structuring their own uses of requisite accreditation procedures.

This delineation of responsibilities whereby institutional members, Boards of Directors, and Executive Committees exercise policy functions, Commissions exercise accreditation review functions, and Staff exercises procedural management functions produces an accreditation system that historically has been rigorous, yet almost totally free of conflict. Simultaneously, the system produces outstanding specific results as well as long-term growth in the capabilities of arts programs in higher education.

Comment:

In practice, conflict of interest is mentioned at the beginning of every accreditation Commission meeting and at every public meeting where accreditation is discussed. Individuals are asked to avoid undertaking accreditation responsibilities where they have close personal relationships, either positive or negative, with individuals involved, or where they have served as a faculty member, a recent consultant, etc. Commission members may not be present when the Commission discusses the institution with which they are affiliated.

Conflicts of interest are addressed during training workshops conducted at annual meetings and staff monitors all evaluators' backgrounds and invitations.

COMMISSION ON PEER REVIEW AND ACCREDITATION
NATIONAL ASSOCIATION OF SCHOOLS OF PUBLIC AFFAIRS AND ADMINISTRATION

Reference/Source:

Policies and Procedures for Peer Review and Accreditation, August 1989

Policy/Procedures:

Introduction

Members of the Commission exclude themselves on all actions in the review process concerned with their own program and in any other instance representing a potential conflict of interest.

Commission Membership

Members of the Commission may not serve as independent consultants to any program that will be reviewed during their terms on the Commission.

Site Visits

The Commission on Peer Review and Accreditation, in consultation with the program, appoints a site visit team consisting of a chairperson and two qualified individuals. [Program is sent a list of five persons and advised that] (a)ccording to our procedures, you may eliminate one name from this group if, in your judgment, this person would not make an effective member of a site visit team for your program. The Commission will appoint a chairperson and two additional members from the candidates....

Appeals

The President of NASPAA shall provide the Appellant program within 30 days a list of six names of impartial persons (and brief biographical sketches) as potential members of a hearing panel. Each of these persons shall have agreed that he or she is willing to serve and have been enjoined from discussing the matter with anyone. Members of the Commission of Peer Review and Accreditation, the Site Visit Team, the Standards Committee and the Executive Council are not eligible for such lists.

The appellant program shall select three persons from the list and notify the President in writing, within 30 days, of the three names selected.

NATIONAL COUNCIL FOR ACCREDITATION OF TEACHER EDUCATION

Reference/Source:

"Guidelines for Ethical and Professional Participation in Various NCATE Activities," Adopted November 1, 1990, NCATE Policies Manual

Policy/Procedures:

Service on the NCATE Board of Examiners and membership on NCATE Boards, Committees or the Review Panel, and participation in related NCATE activities (e.g., folio reviews) frequently create situations that can cause conflicts of interest, prompt questions of ethics, or otherwise raise issues regarding the objectivity and credibility of the accreditation process. To avoid such occurrence, NCATE has adopted the following regulations.

CONFIDENTIALITY STATEMENT

The following statement will be sent to all Board of Examiners members and members of the NCATE Executive Board, Unit Accreditation Board, State Recognition Board, Specialty Areas Studies Board, and Review Panel, and will be read before all meetings of these bodies:

Members of NCATE's governance boards and Board of Examiners are reminded that confidentiality is an integral part of the accreditation process. The boards must have access to much sensitive information in order to conduct reviews of professional education units, curriculum guidelines, and state program approval systems. The confidentiality of this information must be protected by participants in board meetings and on on-site review teams.

Unless indicated otherwise, all meeting and on-site review materials, all information obtained on-site, and all discussions related to the accreditation of units, approval of guidelines, and recognition of state program approval guidelines are confidential. Please remember that confidentiality has no expiration date--it lasts forever!

Adopted by the Executive Board on May 18, 1990.

Conflicts of Interest

1. All NCATE Board members are ineligible to serve on the Board of Examiners during their term on a Board.
2. Review Panel members are ineligible to serve on any NCATE Board, including the Board of Examiners, or in any other capacity connected with NCATE during their tenure on the Review Panel.
3. Any Board member who was a member or chair of a Board of Examiners team at an institution whose unit is under consideration by the Unit Accreditation Board or the Executive Board must absent themselves from the meeting of that Board when the institutional case is considered.
4. When the institution from which a member comes is being considered for accreditation or an appeal, the Board member must leave the Unit Accreditation or Executive board meeting. Members of the State Recognition Board and Specialty Areas Studies Board may make a presentation on the state from which they come or on the guidelines for a professional organization that they represent. However, they must leave the Board meeting when the state or guidelines are being discussed and voted on.
5. Reviewers of curriculum folios for specialty organizations are ineligible to review folios from institutions located in the same state as the reviewer. Reviewers who are also members of the Board of Examiners (BOE) must declare themselves ineligible to serve on a BOE team to an institution whose folio they reviewed.

Ethical Judgments

In some situations clear-cut rules may be difficult to establish. There are many cases where ethical judgments must be made according to the facts of a specific situation. The following principles have evolved over the years in response to NCATE's experience with questions of ethics. These principles are intended to provide guidelines that promote credibility and objectivity in NCATE actions.

1. Board members should not participate in any decision-making capacity if they have a close, active association with an institution, state or professional organization that is being considered for official action by an NCATE board.

   Persons should not serve in any decision-making capacity regarding the accreditation of an institution, recognition of a state, or approval of guidelines if they have formerly been on the faculty or staff, have been a student, or served as a consultant on accreditation matters. This principle also applies when there has been some other significant tie, such as members of a common consortium or special research relationships.

   Personnel involved in accreditation decisions regarding particular institutions should not have otherwise served in evaluation roles regarding the same institution, including membership on state program approval teams, regional accreditation teams, or evaluation committees for boards of trustees or regents.

   Individuals should avoid decision-making activities regarding institutions where they have been paid as consultants, served as a commencement speaker, received an honorary degree, or otherwise profited or appeared to profit from service to the institution.

2. Board of Examiners members should avoid serving on teams at institutions where they maintain close personal or professional relationships.

   Those serving on NCATE Board of Examiners teams and committees are frequently well acquainted with a large number of professionals throughout the nation. Seldom does one find a Board of Examiners team where some member does not know personally faculty or staff within the institution under review. The key to this principle is found in the term close personal or professional relationships. The Board of Examiners team and Unit Accreditation Board members should avoid serving in any decision-making capacity involving an institution where they have colleagues with whom they have jointly authored research or literature, where they have a family relative, or where they have former graduate advisees or advisors. Where earlier supervision of dissertations is involved, personal prejudice is especially difficult to avoid and bias is often assumed.

Other Ethical Considerations

1. All elements of the NCATE evaluation process, including the content of questions and answers, discussions, interpretations, and analyses, are to be treated in the most private and professional manner. Both ethical and legal considerations demand that information acquired through the accreditation process not be used for purposes other than accreditation matters, unless permission is obtained from the institution, state, or professional organization.

2. Documents, reports, and other materials prepared by the institution, state, or professional organization for NCATE action should be treated as private documents in the absence of specific policies that make clear the degree and extent of their exposure.

3. Beyond the principles herein discussed, individuals should exclude themselves from participating in NCATE activities if, to their knowledge, there is some predisposing factor that could prejudice them with respect to the accreditation on institutions, recognition of states, or approval of a professional organization's guidelines.

Ethical Guidelines for Institutions

1. It is the responsibility of each institution to facilitate a thorough and objective appraisal of their professional education units by NCATE.

2. Institutions are allowed to veto Board of Examiners team members only if it can be demonstrated that a potential conflict of interest exists. The right to veto cannot be employed as a process for selecting Board of Examiners team members holding particular predispositions.

3. Institutional personnel should refrain from publicly criticizing those participating in the accreditation process.

4. Any perceived inadequacies of NCATE procedures or processes should be reported by the institution at the time of their occurrence, rather than withheld until after the Unit Accreditation Board has taken action.

Involvement in Consulting Activities

The relationship between NCATE and the institutions that it accredits is based on several objectives. Among these is the function of quality assurance for teacher education, achieved through application of rigorous standards. Essential to the quality of this process are the members of NCATE's governance boards, particularly the Unit Accreditation Board, and the Board of Examiners. Requirements of the Council on Postsecondary Accreditation (COPA) state that members of visiting teams should be "impartial, objective, and without conflict of interest."

A second object of the accreditation process is developmental, to act as a stimulus and resource for promoting change and/or improvement in the preparation of professional educators. Members of NCATE boards play an important role in carrying out this function as well. Appointed to an NCATE board on the basis of their experience and expertise, these individuals may also be asked by institutions to provide advice and consultation on their professional education programs and the accreditation process.

In order to ensure institutions and the public that NCATE reviews are impartial and objective, to avoid conflicts of interest, and to promote equity and high ethical standards in the conduct of NCATE board members, the following guidelines should be applied by all board members:

NCATE Board Members should:

1. Provide advice to institutions in the context of the consultant's professional judgment regard.ng general program improvement;
2. Ensure that the institution understands the context in which consulting advice is given and does not regard such advice as guaranteeing accreditation outcomes;
3. Be sensitive to the relationship betwen consulting arrangements and the timing of NCATE reviews at institutions with which they are consulting;
4. Restrict consulting fees to reimbursement of expenses and/or other reasonable and commonly accepted limits.

NCATE Board Members must:

1. Declare themselves as ineligible to serve on an on-site review team or participate in discussion at a board meeting for any institution at which the member has served as a consultant during the previous five years;
2. Refrain for two years following an accreditation decision from accepting a consulting arrangement at an institution for which the member served on the Board of Examiners team or on the Unit Accreditation Board.

NCATE Board Members shall not:

1. Advertise their status as a member of the Board of Examiners or governance board for the purpose of building a consulting clientele (to do so will result in the member's removal from the board);
2. Solicit consultation arrangements with institutions preparing for accreditation review (to do so will result in the member's removal from the board);
3. Engage in consultation to the extent that it results in excessive conflicts of interest from board members;
4. Give advice to institutions on how to pass specific standards or be accredited;
5. Imply definitive answers on NCATE policies and procedures.

BOARDS OF REVIEW FOR BACCALAUREATE AND HIGHER DEGREE, ASSOCIATE DEGREE, DIPLOMA, AND PRACTICAL NURSING PROGRAMS
NATIONAL LEAGUE FOR NURSING

Reference/Source:

Manual for Accreditation Site Visitors, July 1990

Policy/Procedures:

Conflict of Interest

In order to assure both the objectivity of all site visitor evaluations and the appearance of such objectivity, site visitors are expected to have and maintain certain relationships with the programs they review. Specifically, the NLN expects that a site visitor will not have rendered any services to the program within the preceding two years (24 months) nor will they render any services to the program during the two years (24 months) following the site visit.

Comment:

The National League for Nursing is currently developing a comprehensive statement on conflict of interest. This statement will include a definition of conflict of interest, who is affected, information related to abstaining from the vote, its meaning, voting records as public knowledge, school's perceptions of procedures, appeal process, etc.

COUNCIL ON ACCREDITATION
NATIONAL RECREATION AND PARK ASSOCIATION

Reference/Source:

Procedural Guidelines for the Accreditation Process, Revised October 1986

Handbook for Visitation Team Members, Revised May 1983

Policy/Procedures:

Procedural Guidelines Provisions:

No member of the Council whose institution is being evaluated may participate in any discussions or decisions with respect to that institution. Further, Council members shall not provide private consultation services to any program unless acting on behalf of the Council. The Council shall not recommend consultants, but will provide upon request, a list of past Council members with dates of service on the Council. Current Council members are not eligible. This information shall be transmitted at the time of the preliminary application with a statement disclaiming actions by a consultant on behalf of the Council.

Handbook Provisions:

The Challenges and Responsibilities of Visitation Team Members

...Avoid acceptance of assignments where there may be possible conflict of interest.

...Do not allow institutional or personal social events to interfere with the evaluation process.

...Accept no gratuities, gifts, or favors that might impair or appear to impair professional judgments.

...Resist temptations to seek employment or recruit personnel during the on-site visit.

COMMITTEE ON ACCREDITATION
SOCIETY OF AMERICAN FORESTERS

Reference/Source:

SAF Accreditation Handbook, pg. 18

SAF Visiting Team Manual, pg. 2

Policy/Procedure:

Accreditation Handbook Provisions:

The SAF Associate Director for Educational and Professional Standards, in consultation with the Committee on Accreditation chair, will appoint a visiting team acceptable to the forestry program head, who may challenge, for cause, the appointment of specific team members...No team member may be an alumnus or past faculty member or employee of the institution being reviewed. No team member should have even the appearance of a conflict of interest....

Visiting Team Manual Provisions:

The Visiting Team usually consists of...No member shall be an alumni, have a current affiliation with the institution or reside within the institution's state, or possess any other conflicts of interest that would impair their judgement....

THE COUNCIL ON POSTSECONDARY ACCREDITATION

Reference/Source:

COPA Handbook

Policy/Procedures:

Relative to Conflicts of Interest Provisions and Policies

Among COPA's "Provisions for Becoming Recognized as an Accrediting Body for Postsecondary Educational Institutions or Programs" and Policies are several references to matters dealing with conflict of interest:

A. COPA Provisions for Recognition with Particular Relevance to Issues of Conflict of Interest.

Provision B.4 and B.8:

To carry out its activities in the public interest, an accrediting body:

B.4. Has effective, impartial and objective public representation in its evaluation, policy, and decision making process;

B.8. Provides appropriate and fair procedures for appeals from decisions refusing or terminating accreditation (or candidacy) of an institution or program, such procedures to include consideration by a body whose members did not participate in the original decision, and maintains the accreditation (or candidacy) status of the institution or program until completion of the appeal process.

Provision C.11:

To follow accepted practices of postsecondary accreditation, an accrediting body appoints site visitors using procedures developed to select visitors who are: (a) qualified by academic training, professional experience, and knowledge of the accrediting process; (b) sensitive to the uniqueness of individual institutions and programs; and (c) impartial, objective and without conflict of interest.

B. Policy Statement on Disclosure, Confidentiality and the Integrity of the Accrediting Process. (See page 79.)

Policy Statement
on

DISCLOSURE, CONFIDENTIALITY AND THE INTEGRITY OF THE ACCREDITING PROCESS

The process of accreditation has a two-fold purpose--the assessment and the enhancement of the educational quality of an institution or program. The process requires an honest, rigorous self-analysis, an on-site evaluation by a team of peers or a validated equivalent of an on-site review, a team report, a subsequent review by an accrediting body, and final action defining the accredited status of the institution or program thus evaluated. Concern for the integrity and effectiveness of the investigative and deliberative process involves respect for confidentiality of information required and evaluated. The purposes are endangered and the process is weakened when disclosure of aspects of the process inhibits both the institution's or program's ability to provide complete information and assess itself candidly and the accrediting body's ability to render sound judgments.

The relationship between the accrediting body and the institution or program is private and voluntary. Accrediting decisions are, however, used as a consideration in many formal actions by different publics --- government funding agencies, scholarship commissions, foundations, employers, counselors, and potential students. Accrediting bodies have thus come to be viewed as quasi-public entities operating "for the common good" or "in the public interest", with certain responsibilities to the many groups which interact with the educational community. Thus the legitimate needs of accrediting bodies or those of their members for maintaining and preserving the integrity of the process must be reconciled with broader societal needs requiring disclosure of basic and essential information.

Relevant Considerations

Any attempt to reconcile the conflicting pressures for disclosure and for confidentiality involves consideration of several dimensions which serve to define the options available. First and foremost is the recognition that, since the public interest lies in the assurance that the institution or program is in fact achieving appropriate educational objectives and meeting established standards, the purpose of quality-assessment establishes the specific context within which aspects of the process are to be considered confidential or disclosable.

Within that context other factors must be considered by accrediting bodies as they develop clear and coherent policies on release of information. The timing of disclosure may in some instances be critical to preserve the integrity of the process and to provide correct information. The extent of disclosure may also be critical. Not all information gathered requires full disclosure, and such disclosure may neither serve the public interest nor help the institution. The substantive relevance of information to the purpose of quality-assessment should also be a significant consideration. Further, since information may be provided for varied purposes in different ways, the means of dissemination may be a significant factor in providing the clearest context of understanding of the information.

Accrediting bodies also have a responsibility to understand the legal responsibilities that are imposed as a consequence of being considered quasi-public entities. COPA policy statements, guidelines, and provisions for recognition (Part B in particular) acknowledge these obligations.

. . . . . .

Principles Relevant to Disclosure

In addressing the specific issues relevant to disclosure of information on aspects of the accrediting process, the following principles, consistent with the COPA provisions for recognition and the integrity of the accrediting process, are set forth:

1. Each accrediting body should have a clear statement of policy on what is to be reserved or kept confidential and what is to be disclosed with respect to documents generated in the accreditation process, information concerning decisions on accredited status, and information concerning the status of affiliation of the institution or program with the association.

2. Concern for maintaining and protecting the integrity and effectiveness of the accrediting process should play the major role in shaping accrediting body policies and procedures on disclosure of information.

3. Since quality-assessment defines the matrix within which items are to be considered disclosable or confidential, clear distinctions must be drawn between those substantively related to the determination of accredited status and those related to institutional or program improvement, e.g., between recommendations for action considered essential for maintenance of accredited status and advisory suggestions for the enhancement of the institution's or program's educational quality. The latter are not relevant for public disclosure.

4. Since the accreditation process involves the work of voluntary peer-evaluators, great care must be taken to ensure not only that the composition of visiting teams and review committees represents appropriate, relevant, and varied expertise, points of view and experience, but that evaluators are rigorously trained in good practices of securing and processing information essential for an objective and responsible review, and of reproducing this information in the reports or other communications developed.

5. In the development of policies and procedures for disclosure of information consistent with these principles and with COPA provisions for recognition, accrediting bodies should take account of the following guidelines, organized according to five categories of disclosure.

. . . . . .

Guidelines for Accrediting Bodies on Disclosure of Accrediting Information

The following guidelines have been developed by COPA to assist accrediting bodies in determining the extent of disclosure essential to meeting their responsibilities to the many persons and groups which interact with the educational community, while maintaining the integrity and effectiveness of the self-regulatory process as a reliable authority in identifying quality in postsecondary education.

The relationship between the accrediting body and the institution or program is a contractual one, whether formal or informal. Legally the institution is the governing board or the corporate board of directors. When an institution is part of an

educational system in which the institution's chief executive officer is in a line relationship to the chief executive officer of the system, this relationship should be taken into account in developing procedures for dissemination of information.

I. Information which must be published and disseminated.

A. Information concerning the accrediting body

The accrediting body must describe in official documents its scope, evaluative criteria, and procedures (Provision B.3.; C.4.), clearly delineating the process by which the accrediting decision is reached (Provision C.2.; C.4.) and the outcome of the process with respect to given institutions or programs (C.13.; C.14.).

B. Information relevant to decisions on pre-accreditation or accreditation status

1. At least annually, in an official publication, a current listing of all institutions or programs with status in the accrediting body. (Provision B.4.)

2. At least annually, in an official publication,[2] all final decisions with respect to accredited status, affirmative and negative,[3] made

3. Any accrediting body procedures or policies for the release of additional information relevant to such decisions. (Provision B.3.)

II. Information that should be published relevant to affiliation status.

At least the following information should be published in an official publication concerning the status of affiliation of an institution or program with the accrediting body, unless the information is otherwise available. The information should be preceded by a statement of the accrediting body's body scope of accreditation activities, and indications as to where additional information may be obtained.

1. The name and address of the institution.
2. Designation of the institution's character and form of governance -- public or private, nonprofit or for profit, and whether it is part of a system.
3. Names of the chief executive officer, and, in the case of specialized programs, the name of the program director.
4. Accredited status:

Date of initial accreditation.

Date of most recent final action following a comprehensive evaluation.

5. Indication of whether degree-granting programs are offered at multiple program sites.

6. Level of offering--non-degree, associate, baccalaureate, professional, master's, doctoral.[4] (Specialized accrediting bodies will designate the level of program(s) accredited)

III. Information which is available upon request.

A. Information relevant to affiliation status.

At least the following information should be made available in response to inquiries from parties seeking information relevant to the status of a specific institution or program.[5]

1. Name and address of the institution.
2. Institution's character--public or private, nonprofit or for profit--with identification of proprietors of for profit institutions.
3. Accredited status.
4. Location(s) of offerings.[6]
5. Level of offerings.

B. Information concerning the accrediting body

1. Surveys, reports, etc., of the accrediting body.
2. A yearly list of scheduled visits.
3. The academic and professional qualifications of the members of its policy and decision-making bodies and its administrative personnel.

IV. Information available only from the institution, or by the accrediting body with the consent of the institution.

This category includes information supplied by the institution or program and/or the accrediting body in the course of the accrediting process and not incorporated in other public documents, such as the self-study, team report, recommendations of the team or intermediate review committee, institutional/programmatic responses to recommendations, and correspondence between the accrediting body and the institution related to the accreditation process.

Accrediting bodies should encourage institutions or program to make publicly available information about their accredited status, and to share visiting team reports and institutional program responses with appropriate state agencies authorized to evaluate and approve institutional academic programs and therefore having a legitimate claim to information beyond that available to the general public.

V. Information necessary to correct misrepresentation

If an institution or program releases information that misrepresents or distorts any action by the accrediting body with respect to any aspect of the accreditation process, or the status of affiliation with the accrediting body, the chief executive officer of the institution and the program director, where applicable, will be notified and informed that corrective action must be taken. If the misrepresentation or distortion is not promptly corrected, then the accrediting body may, at its discretion, release a public statement in such a form and content as it deems necessary to provide the correct information.

VI. Information not available for dissemination under any circumstances.

Certain relationships yield information which legally cannot be disclosed without the consent of the person who provides it -- for example, the relationship between physician and patient, between attorney and client, between clergy and penitent, etc. Should such information, or other information that is protected under law by a comparable privilege or safeguard, come into the hands of an accrediting body or evaluation team, its disclosure to persons other than the immediate recipients would of course be inappropriate and might even be legally actionable.

Adopted by the COPA Board
October 11, 1984

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[1] An analysis of the judicial and legislative context relevant to the responsibilities of accrediting agencies is available from the COPA office. In addition, associations may find significant help in the COPA Occasional Paper by William K. Kaplin on "Accreditation and the Public Interest".

[2] The publication need not necessarily be the same as the one listing current accredited status. It may appear in a newsletter, quarterly, or public portion of Commission/Board minutes.

[3] If an appeal of a negative decision is filed, the accrediting body may withhold the public announcment of the decision during such an appeal. (COPA policy statement "Accreditation and the Public Interest", 4) during that year. (Provision B.4.) An institution or program which withdraws an application for status need not be identified. A decision to deny an initial application for status need not be published.

[4] This information may be provided by special designation, i.e., "a, b, p, m, d" or other pattern; a general statement concerning the college's offering of programs in arts, sciences, and/or professional curricula at a particular degree-level or of courses at this level not applicable to degrees offered; reference to the institutional catalog; or reference to the COPA office for specificity concerning specialized accreditation of programs.

[5] Each accrediting body should maintain a brief history of the accredited status of all institutions or programs. The accrediting body may refer the inquirer to the institution for additional information, or develop with the institution a joint statement that both may use.

[6] Expanded information may be provided on off-campus sites (in-state, out-of-state, out-of-region, military bases, etc.) and/or the inquirer may be directed to the institution for such detail.

Professional Development Committee
Council on Postsecondary Accreditation

"Conflicts of Interest"

Return this questionnaire by November 26, 1990, to:

Ms. Patricia P. Evans
c/o Council on Education for Public Health
1015 Fifteenth Street, NW, Suite 403
Washington, D.C. 20006

Telephone: (202) 789-1050
FAX: (202) 289-8274

1) Does your organization have an explicit policy related to conflicts of interest?

2) If yes, please identify the location (e.g. bylaws, procedures manual, criteria or standards documents, etc.) and attach a copy, being sure to reference the source. See attached

3) If not, please describe how your organization deals with possible conflicts of interest.

4) In your opinion, to whom should conflict of interest policies apply? Check all that apply.

[ ] Commission/board members
[ ] Site visit team members
[ ] Consultants/readers
[ ] Staff
[ ] Others, Specify: _____
_____

5) In your opinion, what are the critical ingredients of effective conflict of interest policies and practices (e.g. definitions, established protocols, disclosure, opportunities to challenge, etc.)?

6) Has your organization encountered any recent instances in which conflict of interest became an important consideration? Please describe the situation and key actors (do not identify individuals or institutions). Use the reverse side of this questionnaire or additional sheets for your response.

Respondent: _____
Accrediting Body: _____
Phone No.: _____